Staff Report to the Planning Commission

Application Number: 241360

Applicant: Clay Toombs for Workbench
Owner: Sweet Developments LLC, LHO Santa Cruz Hotel One, L.P.
APN: 025-013-37 & 102-061-10
Site Address: 3500 Paul Sweet Road, Santa Cruz

Agenda Date: January 14, 2026
Agenda Item #: 9

Time: After 9:30 a.m.

Project Description: Proposal to construct 105 units within a six-story multifamily building. The project includes a 32.5-percent Density Bonus in exchange for the provision of six affordable units (comprised of six Extremely Low (ELI) units). Requires approval of a Site Development Permit pursuant to SB 330 and Builder's Remedy (Gov. Code § 65589.5) and Density Bonus pursuant to Government Code Section 65915.

Location: The project site is located to the east of Paul Sweet Road at 3500 Paul Sweet Road in Santa Cruz.

Entitlements Required: Site Development Permit pursuant to SB 330 and Builder's Remedy (Gov. Code § 65589.5) and Density Bonus pursuant to Government Code Section 65915.

Supervisorial District: First District (District Supervisor: Manu Koenig)

Staff Recommendation:

- Deny concession request in-part for the requested reduction in the number of required parking spaces to zero spaces, instead grant a concession reducing the number of required vehicle parking spaces to 68 spaces.
- Deny waiver request in-part to reduce the number of parking spaces below what is required by State Density Bonus Law, as the project shall instead utilize a concession to reduce the number of required parking spaces; however, grant the waiver for all other County parking standards.
- Grant remaining concession and waiver requests.
- Determine that the proposal is exempt from further Environmental Review under the California Environmental Quality Act.
- Approve Application 241360, based on the attached findings and conditions.

Project Scope

The proposed Builder's Remedy project includes redevelopment of one parcel containing a single-family residence with construction of a new six-story residential building which includes a parking

podium to accommodate 68 parking stalls. The project includes 105 rental units, including six Extremely Low-Income affordable units, and is approximately 91,917 gross square feet in size. The proposed dwelling unit mix is comprised of 30 studio units, 60 one-bedroom units, and 15 two-bedroom units.

Vehicular access to the podium off-street parking area is available from Paul Sweet Road. A portion of the parking garage is subgrade to allow for a portion of a car puzzler (a mechanical parking stacker) and a mechanical room. The primary pedestrian entrance to the site is also accessed from Paul Sweet Road, via a proposed four-foot-wide sidewalk with curb and gutter to connect with the existing sidewalk along Paul Sweet Road to the south of the project site. The ground floor would consist of a small office, lobby area, a mail room, trash room, bicycle parking area, and storage room. The second story includes an exterior common area terrace measuring about 3,894 square feet in size with landscaping and seating areas, private terrace areas, and additional bicycle parking areas. Private balconies or patios are also available for most of the units.

Senate Bill 330

On April 22, 2024, the Applicant submitted a Senate Bill (SB) 330 Preliminary Application for 84 dwelling units, followed by submittal of a formal Builder's Remedy Planning Application on October 2, 2024, for 84 dwelling units and 21 storage spaces for future conversion to accessory dwelling units (ADUs). The SB 330 Preliminary Application provides an optional vesting opportunity for housing development projects. Pursuant to SB 330, housing development projects are subject only to the ordinances, policies, standards, and fees in effect when the SB 330 Preliminary Application is submitted, including development impact fees, capacity or connection fees or charges, permit or processing fees, and any other required payments. After a SB 330 Preliminary Application is filed, an Applicant has 180 days to submit a full discretionary permit application. The Applicant's full submittal was received on October 2, 2024, meeting the 180-day timeline requirement.

Builder's Remedy

The California Legislature adopted the Housing Accountability Act (HAA) (Gov. Code §65589.5) to "significantly increase the approval and construction of new housing for all economic segments of California's communities by meaningfully and effectively curbing the capability of local governments to deny, reduce the density for, or render infeasible housing development projects…." (Gov. Code § 65589.5(a)(2)(K)). It is the policy of the State that the HAA "be interpreted and implemented in a manner to afford the fullest possible weight to the interest of, and the approval and provision of, housing." (Gov. Code § 65589.5(a)(2)(L)).

The "Builder's Remedy" is a provision of the HAA that is applicable to qualifying housing development projects when a preliminary application is submitted while the jurisdiction lacks a certified Housing Element. Clay Toombs of Workbench (Applicant) submitted SB 330 Preliminary Application No. PA241023 on April 22, 2024, for a housing project proposing 20% of units as affordable to lower-income households, during the period before the County's Housing Element was certified on April 23, 2024[1]. Although the County adopted its 2023 Housing Element in November 2023, the State Department of Housing and Community Development (HCD) did

1 The County Housing Element's certification date was later revised to April 12, 2024.

not certify the Housing Element until April 2024, leaving approximately four months when developers could qualify for the Builder's Remedy.

The HAA limits a local jurisdiction's ability to disapprove a housing project, except in very specific circumstances. These include:

1. The jurisdiction has met or exceeded its Regional Housing Needs Allocation (RHNA) for the proposed income categories in the development.

2. The housing development or emergency shelter would have a specific adverse impact on public health and safety.

3. The denial or condition is required to meet state or federal law, and there is no feasible method to comply without making the development unaffordable.

4. The project is proposed on land zoned for agriculture or resource preservation that is surrounded on at least two sides by land being used for agriculture or resource preservation, or there are not adequate water or sewage facilities to serve the project.

5. The project is inconsistent with both the zoning ordinance and the land use designation as specified in the general plan element, and the jurisdiction has adopted a housing element in substantial compliance with State Law.

"Builder's Remedy" refers to subsection (5) above and applies when a local jurisdiction's housing element is not substantially compliant with State Law. If an application for a housing project is submitted during this time of non-compliance, the local jurisdiction cannot disapprove the project on the basis that it does not comply with the County's General Plan and Zoning Ordinance.

Builder's Remedy 2.0

On September 19, 2024, the governor signed a major reform of the Builder's Remedy portion of the HAA. Assembly Bill (AB) 1893 has been dubbed "Builder's Remedy 2.0" and became effective on January 1st, 2025. Builder's Remedy 2.0, located in Government Code Section 65589.5 modifies the original Builder's Remedy; however, housing projects that were submitted before the effective date may opt to be considered under the new law (or may decide to stick with the previously-existing law.)

Builder's Remedy 2.0 introduces new site restrictions, sets new density limits, and allows jurisdictions to impose objective standards that would facilitate the project, key provisions summarized as follows:

- **Density Minimums.** Builder's Remedy 2.0 sets new density minimums for Builder's Remedy projects. Generally, the applicable minimum density is the lower of the lowest density provided for in the jurisdiction or one-half of the jurisdiction's Mullin density (The County's Mullin density is 20 dwelling units per acre (du/ac). Half of the Mullin density is 10 du/ac).

- **Density Maximums.** Density cannot exceed the greatest of:
  - 50% greater than the "Mullin density" in State Law (20 dwelling units [du]/acre for a total of 30 du/ac in our county).
  - Three times the density allowed by the General Plan, zoning ordinance, or State Law (whichever is greater).
  - The density specified in the jurisdiction's Housing Element.
  - For parcels within ½ mile of a major transit stop on in a state designated high or highest resource area, an additional 35 du/acre over the above.

Builder's Remedy 2.0 also allows Applicants to add any density bonus afforded by State Density Bonus Law, which can further increase density by up to 100% for qualifying affordable projects (near transit).

- **Objective Standards.** Jurisdictions may require projects to meet certain objective local standards if those standards do not preclude the project from achieving the proposed density (up to the maximums described above) and:
  - The standards must be objective (quantifiable and requiring no judgment), and written.
  - If the jurisdiction has a zoning district (or General Plan land use designation) that allows the proposed density and unit type, the jurisdiction may require the Builder's Remedy 2.0 project to comply with the standards of that zoning district or designation to facilitate the project.
  - If the jurisdiction does not have a zoning district (or General Plan land use designation) that allows the proposed density and unit type, then the Applicant may choose any objective standards associated with another zoning district or designation that facilitate the project's density and unit type, and those standards will apply.

- **Affordability.** Builder's Remedy 2.0 also introduces new affordability requirements, lowering the required affordability levels to the options listed below, and clarifying several other requirements related to local inclusionary requirements[2] (such as the County's Measure J affordable housing requirements, codified in Santa Cruz County Code [SCCC] Chapter 17.10):
  - At least 7% of the units are affordable to extremely low-income households;
  - At least 10% of the units are affordable to very low-income households;
  - At least 13% of the units are affordable to lower-income households; or
  - 100% of the units are affordable to moderate-income households.
  - The affordable units must have comparable bedroom and bathroom counts with the market-rate units.[3]
  - The project is required to comply with any local affordable housing requirements that may require greater affordability percentages or "deeper" affordability levels than those required by Builder's Remedy 2.0, as long as it makes findings that those requirements will not render the project financially infeasible, and as long as those requirements do not require more than 20% of the base units to be affordable. The County's local inclusionary ordinance

2 Gov. Code § 65589.5(f)(6)(G) (as amended by AB 1893).
3 Gov. Code § 65589.5(f)(6)(G)(ii) (as amended by AB 1893).

(SCCC Chapter 17.10) requires rental housing projects to pay an Affordable Housing Impact Fee (AHIF). As an alternative to paying the AHIF, the applicant may propose to provide 15% of the dwelling units as affordable units, or if providing less than 15% affordable units, they may request credit against the AHIF for any affordable units provided to qualify for a density bonus, as set forth in the County's Affordable Housing Guidelines. Other aspects of the local inclusionary ordinance, such as objective standards pertaining to the design and/or location of affordable units within the project (which are generally intended to affirmatively further fair housing), may not be imposed on Builder's Remedy 2.0 projects. However, an Applicant could voluntarily agree to comply with such local standards intended to further fair housing for the future occupants of the affordable units.

- As an alternative to paying the AHIF, each affordable unit dedicated to qualify for Builder's Remedy 2.0 could count toward satisfying the local affordable housing requirement (i.e., SCCC Chapter 17.10, which implements Measure J, the voter referendum that requires at least 15% affordable units in new developments). Each affordable unit dedicated pursuant to a local affordable housing requirement that meets the criteria established in this subparagraph could count towards satisfying the requirements of this subparagraph.

Builder's Remedy 2.0 also amplifies density bonus benefits, by allowing additional bonus units and additional concessions/incentives.

Project Conformance with Builder's Remedy 2.0

The proposed project elects the provisions of Builder's Remedy 2.0. Builder's Remedy 2.0 also contains pipeline provisions, allowing projects that were "deemed complete" (under the HAA, "deemed complete" means an SB 330 Preliminary Application was submitted) prior to the effective date of the statute (January 1, 2025) to elect for the amended provisions of Builders Remedy. The project is eligible to be subject to Builder's Remedy 2.0 because it was "deemed complete" in that a SB 330 Preliminary Application was filed on April 22, 2024, when the County did not have a certified Housing Element. The project's proposed density was increased from 84 units to the current project scope of 105 units, as allowed pursuant to Builder's Remedy 2.0. Builder's Remedy 2.0 explicitly allows a housing development project deemed complete before January 1, 2025, to be revised, "even if the revision results in the number of residential units or square footage of construction changing by 20 percent or more." (Gov. Code § 65589.5(f)(7)(B)).

Table 1 provided below summarizes the project's eligibility for Builder's Remedy 2.0 as introduced in the preceeding section of this staff report.

Table 1: Project Eligibility for BR 2.0 – Site Location and Project Density

Eligibility Requirements	***County Notes***
Site Restrictions. The project is not located on a site that is adjacent to parcels with heavy industrial uses or uses that require an operating permit issued under the federal Clean Air Act.	*No such uses are present on the site or adjacent parcels. This site requirement has been met.*
Density Minimums. The applicable minimum density is the lower of the lowest density provided for in the jurisdiction or one-half of the jurisdiction's Mullin density (10 du/ac in the County).	*The County's Mullin density is 20 dwelling units per acre (du/ac). Half of the Mullin density is 10 du/ac. The project proposes a "base density" of 135 du/ac. This density minimum requirement has been met.*
Density Maximums. Density cannot exceed the greatest of: ▪ 50% greater than the "Mullin density" in State Law (20 dwelling units [du]/acre for a total of 30 du/ac in our county). ▪ *Three times the density allowed by the General Plan, zoning ordinance, or State Law (whichever is greater).* ▪ The density specified in the jurisdiction's Housing Element. ▪ For parcels within ½ mile of a major transit stop on in a state designated high or highest resource area, an additional 35 du/acre over the above.	*The maximum allowable density is the "base density." Per Gov. Code Section 65589.5(h)(11)(C)(i)(II) and (ii)(III), base density is subject to density maximums, and does not include density bonus units themselves. The project is located in the C-O and R-UH General Plan designations, which allow a maximum of 45 du/ac. Three times 45 du/ac is 135 du/ac. The project proposes to use a base density of 135 units per acre. 135 du/ac multiplied by the 0.585-acre area of the project site results in 78.9 units, which rounds up to 79 units proposed in this project, not including bonus units. Thus, the project does not exceed the maximum allowable density for this site pursuant to BR 2.0.*

In regard to allowed density, Builder's Remedy 2.0 also allows Applicants to add any density bonus afforded by State Density Bonus Law, which can further increase density by up to 100% for qualifying affordable projects.

The project includes six Extremely Low Income (ELI) affordable units, which qualifies the project for a 32.5% density bonus, equal to 26 bonus units, pursuant to State Density Bonus Law, bringing the total to 105 units (79 base units plus 26 density bonus units). The density as proposed meets applicable requirements pursuant to the provisions of Builder's Remedy 2.0 and State Density Bonus Law.

Table 2 provided below summarizes the applicable objective standards for the project, as electing for Builder's Remedy 2.0:

Table 2: Applicable Objective Standards Pursuant to Builder's Remedy 2.0

Objective Standards Requirements	***County Staff Assessment***
Objective Standards. Jurisdictions may require projects to meet certain objective local standards if those standards don't preclude the project from achieving the proposed density (up to the maximums described in Table 1 above) and: ▪ The standards must be objective (quantifiable and requiring no judgment) and written. ▪ If the jurisdiction has a zoning district (or General Plan land use designation) that allows the proposed density and unit type, the jurisdiction may require the Builder's Remedy 2.0 project to comply with the standards of that zoning district or designation to facilitate the project. ▪ If the jurisdiction does not have a zoning district (or General Plan land use designation) that allows the proposed density and unit type, then the Applicant may choose any objective standards associated with another zoning district or designation that facilitate the project's density and unit type, and those standards will apply.	*The standards that have been chosen by the Applicant to facilitate the project's density applicable to the project are the RF (Residential Flex) zone district and the R-UHF (Urban High Flex) General Plan designation, which allow for a 45 du/ac base density, accomodating the 135 du/ac base density proposed by the project. Only objective, quantifiable, and written development standards (Gov. Code Section 65589.5(f)(6)(A)) are applicable, and only in accordance with the definition at Gov. Code Section 65589.5(f)(9). Also, as a SB 330 project, only those ordinances, standards, policies, and fees in effect at the time when the SB 330 Preliminary Application was submitted apply. The project meets all objective standards with qualifying Density Bonus concessions and waivers where applicable. The local jurisdiction cannot disapprove the project on the basis that it does not comply with the County's General Plan and Zoning Ordinance.*

Table 3 provided below summarizes the applicable affordability requirements for the project under Builder's Remedy 2.0:

Table 3: Builder's Remedy 2.0 Affordability Requirements

Affordability Requirements	*County Staff Assessment*
Affordability. Builder's Remedy 2.0 introduces new affordability requirements, lowering the required affordability levels to the following options: ▪ At least 7% of the units are affordable to extremely low-income (ELI) households; ▪ At least 10% of the units are affordable to very low-income (VLI) households; ▪ At least 13% of the units are affordable to lower-income households; or ▪ 100% of the units are affordable to moderate-income households.	*The proposed project includes 7% of its 79 "base" units as affordable to ELI households, which equals 6 ELI units. Therefore, the project meets the affordability requirements for Builder's Remedy 2.0.*
Comparable Affordable Units The affordable units in the project must have comparable bedroom and bathroom counts with the market-rate units, as required by Gov. Code §65589.5(f)(6)(G)(ii).	*The Applicant declined to provide sufficient detail in their application for staff to evaluate compliance with this requirement; however, the project is conditioned to meet this requirement through recordation of the Regulatory Agreement, as noted in Condition of Approval II.M. The regulatory agreement will include this requirement, and will identify the affordable units proposed to be initially leased up to Extremely Low Income Households, so that compliance with this requirement can be verified prior to construction.*
Compliance with Local Inclusionary Ordinance, within limits imposed by Gov. Code §65589.5(f)(6)(G)(i) *et seq*. This provision of Builder's Remedy 2.0 requires projects to comply with local affordable housing requirements (such as the County's Measure J requirements imposed through SCCC 17.10) as long as such requirements do not require more than 20% of the base to be affordable. Further, the County is not allowed to impose its otherwise applicable objective design standards for affordable units on Builder's Remedy 2.0 projects.	*SCCC 17.10 outlines provisions for new rental housing developments with several alternative options for compliance:* *1) Pay the Affordable Housing Impact Fee (AHIF) at the rental housing rate (currently $2/SF); or* *2) Provide 15% of the units within the project as Lower-income (80% AMI) affordable units (any affordable lower-income units provided for the density bonus and/or BR 2.0 count toward this requirement); or* *3) In density bonus projects, request credit against the AHIF fee otherwise due for any affordable units provided within the project to earn the density bonus.* *The project is conditioned to meet Alternative 1 from the list above. Applicant has stated that they intend to protest the fee on the allegation that it is unconstitutional and does not meet the nexus and proportionality requirements under State Law. The County's affordable housing impact fee is supported by a nexus study in compliance with State Law.*

As summarized in the three preceding tables, the project meets, or is conditioned to meet, all eligibility requirements in its election for Builder's Remedy 2.0. Further analysis of the project is provided in the remaining sections of the staff report, provided below.

Affordable Housing and Density Bonus

The project as proposed includes six affordable ELI units (7% of the Builder's Remedy 2.0 base density of 79 units). Pursuant to Government Code Section 65589(f)6(c)(iv), providing the ELI units earns the project 3% extra credit toward the density bonus. This means that the project qualifies for the same amount of density bonus as a project that is providing 10% lower income affordable units. In other words, the project as proposed qualifies for a 32.5% density bonus pursuant to state law. That equals 26 bonus units, increasing the allowable project size to 105 units (79 base units, including the 6 ELI units, plus 26 density bonus units).

Density Bonus Law allows applicants to request specific incentives or concessions. As proposed, the project qualifies for a total of four concessions or incentives. (Projects that include at least 10% of the base units for very low-income units, including the extra credit allowance, qualify for two incentives or concessions and two additional incentives or concessions are granted pursuant to Government Code Section 65589(f)(6)(C)(i); thus, the project qualifies for a total of four concessions or incentives).

Density Bonus Law allows applicants to request waivers of any development standards that have the effect of physically precluding the construction of an eligible housing development at the density proposed. There is no limit to the number of waivers that may be requested.

Location and Design

The County's Affordable Housing Ordinance (SCCC 17.10) contains certain site layout and/or design requirements for affordable units, including that they must be distributed throughout the development project and contain not less than the average bedroom count in the market rate units in the project (SCCC 17.10.032). These requirements are precluded by provisions in Builder's Remedy 2.0 cited above. However, there is a requirement in Builder's Remedy 2.0[4] that requires the affordable units in the project to have a comparable number of bedrooms and bathrooms as the market-rate units in the project, as noted above.

The Applicant has not yet identified in their application or project plans which units would be the affordable rental units; however, the project has been conditioned to meet this requirement (Condition II.M).

The Applicant is required to comply with the applicable provisions of Gov. Code Section 65915 (the density bonus law), and with CA Health and Safety Code (HSC) Section 17929, which applies to all mixed-income multifamily structures of five or more units that include deed-restricted units of any kind, such as those provided to qualify for a density bonus or to comply with inclusionary zoning. Pursuant to HSC Section 17929, occupants of affordable units shall have the same access to common areas and amenities as market rate units, and the affordable housing units shall not be isolated to a specific floor or area on a specific floor. While this statute prohibits some of the most egregious design-related housing discrimination practices seen in some extreme cases (such as

4 Gov. Code § 65589.5(f)(6)(G)(ii) (as amended by AB 1893).

several in New York and San Diego cited by the author of the bill, AB 491 of 2021, which created this provision of the law), HSC 17929 policies do not go quite as far to affirmatively further fair housing (AFFH) as the design and locational standards for affordable units in County Code Chapter 17.10, which have been added to the code over the years to comply with other state laws requiring localities to affirmatively further fair housing (AFFH). However, since the State is now ironically prohibiting the County and other localities from applying their AFFH policies in their local inclusionary codes to Builder's Remedy 2.0 projects, the project has been conditioned to comply only with the minimal design-related anti-discrimination policies in Builder's Remedy 2.0 and HSC 17929.

The Applicant has not requested credit against the Affordable Housing Impact Fee (AHIF) for the six affordable units they propose to qualify for the density bonus and/or Builder's Remedy 2.0. If they accepted that option, the available credit would offset the entire AHIF otherwise due for the project. Instead, the Applicant has opted to decline that available credit and pay the AHIF in full, under protest, as allowed by the state Mitigation Fee Act. The Applicant has stated that they intend to protest the AHIF on the basis that they believe that the fee is unconstitutional. Staff disagrees with the Applicant's contention. The AHIF is constitutionally valid because the fee has an essential nexus to the impact of market rate units on affordable housing in the County, as supported by the County's nexus study conducted in 2014. Moreover, it is proportional as it is based on the square footage of the market rate units, and the current fee rate is a relatively modest $2 per square foot.

Notwithstanding the above-noted inconsistencies with County Code, pursuant to the Builder's Remedy provisions of the HAA, 6 of the 79 units proposed as part of the project are designated as affordable ELI units, consistent with Builder's Remedy 2.0; thus, the County may not disapprove the project based on the project's noncompliance with the preempted standards for onsite affordable units set out in Chapter 17.10.

Duration of Deed Restriction

The affordable units included in the project are subject to State Law, in accordance with Government Code Section 65915(b) and (c), to be specified in a recorded affordable housing agreement for a term of 55 years.

Density Bonus - Concessions, Incentives and Waivers

Projects that are eligible for a density bonus may request a certain number of "concessions" or "incentives" (depending on percentage and type of affordable units proposed) as set forth in more detail in the law, and an unlimited number of "waivers of development standards" in order to make the proposed development buildable.

- **Concessions/Incentive** - A "concession" or "incentive" is defined as "[a] *reduction in site development standards or a modification of zoning code requirements* or architectural design requirements … that result in *identifiable and actual cost reductions,* to provide for affordable housing costs...." (Gov. Code § 65915(k)(1).) Applicants are required to provide adequate information to support a determination as to establish eligibility for the concessions/ incentives. (Gov. Code § 65915(a)(3)(D)(III). However, local agencies cannot require density bonus applicants to submit pro formas or other documentation to prove that requested

incentives/concessions are necessary to make the housing development financially feasible. *(Schreiber v. City of Los Angeles* (2021) 69 Cal.App.5th 549*.)*

- **Waiver** - An applicant may also request a waiver of any development standard that would have the effect of physically precluding the development. Waivers are related to the physical design and site plan of the project in relation to the local development standards and are available to reduce any conflicts with those standards that are necessary to allow the project to be built. Waivers are often requested to get greater flexibility with local height limits or minimum setbacks. Applicants are required to provide adequate information to support a determination as to establish eligibility for the waivers. (Gov. Code **§** 65915(a)(3)(D)(III).)

- **The County must grant the concession/incentive or waiver** unless it makes written findings that:
  - The concession/ incentive does not result in identifiable and actual cost reductions;
  - The concession/incentive or waiver would cause a *specific, adverse impact* upon public health, safety, the environment or on any property listed in the California Register of Historic Resources; or
  - The concession/incentive or waiver would be contrary to state or federal law.

- A **"specific, adverse impact"** means "a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete." (Gov. Code § 65589.5(j)(1)(A).)

A project that utilizes density bonus is considered consistent with the General Plan and zoning, regardless of any granted waivers or concessions. (Gov. Code § 65589.5(j)(3).)

Written Requests for Concessions, Incentives, and Waivers

The Applicant has submitted written requests (Architectural Plan Sheet GP0.01, dated May 15, 2025 (Exhibit D), Design Guidelines Project Checklist Analysis (Exhibit G), Letter File v4, dated May 16, 2025 and Response to Compliance Comments Letter, dated June 27, 2025, on file at the Planning Division) regarding various County objective standards, requested waivers, and the Applicant's justifications for waivers. The Applicant's requests are provided below:

Requested Concessions

1. "Expedite Appeal Process – in the event of any appeal of the Project or any of its approvals, the County shall hold a hearing to consider the appeal(s) within 25 calendar days after the expiration of the appeal period prescribed by Santa Cruz County Code. County shall not grant an extension of the appeal period, except upon request of the Applicant, County shall grant an extension specified by the Applicant not to exceed 65 calendar days beyond the 25 calendar days deadline to conduct the Board of Supervisors hearing. The Board of Supervisors shall not refer the appeal(s) to any subordinate decision-making body before deciding whether to approve or deny the appeal. County shall do all things necessary to effectuate this concession, including making timely public notices to allow for the expedited appeal before the Board of Supervisors. If any element of this concession is

contrary to State Law, the County shall expedite its decision on the appeal as nearly consistent with this concession as allowed by State Law. This concession/incentive is requested pursuant to Gov. Code Section 65915(d) and 65915(k)(3). This concession will result in identifiable and actual cost reductions to provide for affordable housing costs. Appeals and their associated delays to final project approval impose substantial costs in the form of land carrying costs, fees to consultants, increases in construction costs due to inflation, etc."

2. "Priority Processing - Applicant requests that upon making the determination that this development permit application is complete, the project will be immediately assigned to staff for processing in advance of all nonpriority applications (i.e., a development permit application that has not requested an incentive or concession for priority processing) including scheduling for environmental review (if required) and subsequent scheduling for public hearing and final action by the decision-making body or bodies. This concession is requested pursuant to Gov. Code Sections 65915(d) and 65915(k)(3). This concession will result in identifiable and actual cost reductions to provide for affordable housing costs. Accelerating final project approval saves substantial costs in the form of land carrying costs, increases in construction costs due to inflation, etc."

3. "Reduce the parking required by Santa Cruz County Code to zero spaces. The parking required for the project by Santa Cruz County Code shall be reduced to zero spaces. The project owner intends to provide parking as indicated in the project plans, and to provide ADA and EV parking spaces as required by State and Federal law. However, the development permit approval for this Project shall not require provision of any parking spaces. The project qualifies for parking reductions in accordance with the State Density Bonus Law. For clarity, and conciseness, in addition to the waiver requested for parking Applicant chooses to request this concession in addition to other parking reductions and waiver. This concession/incentive will result in identifiable and actual cost reductions to provide for affordable housing costs. This concession/incentive is requested pursuant to Gov. Code Sections 65915(d) and 65915(k)(3). The cost of constructing parking spaces is a major component of a project's cost."

    a. ***County Staff Response:*** Staff recommends partially denying this concession/ incentive, because the project as designed provides more parking (68 spaces) than the amount requested as a concession (zero spaces). Under the County Code, 115 resident and 23 guest spaces would be required. Under State Density Bonus Law, this requirement is reduced to 113 spaces in total. Density Bonus Law further permits an Applicant to "request parking incentives or concessions beyond those provided" as an incentive/ concession. (Gov. Code § 65915(p)(5).) The Project is designed to include 68 total vehicle parking spaces. This indicates that any parking reduction below 68 spaces would not result in identifiable and *actual* cost reductions, because the project as proposed by the applicant is designed to have 68 spaces. Accordingly, Staff recommends granting a concession to reduce the required number of vehicle parking spaces to 68 spaces.

As referenced in SCCC Section 17.12.040, Density Bonus Law allows Applicants to request specific incentives or concessions. As proposed, the project qualifies for a total of four concessions or incentives. The applicant is utilizing three of the four concessions for which the project is

eligible. The Applicant is requesting the above-listed incentives or concessions for this project.

As detailed above, Staff recommends partially denying one of the concessions, by granting a reduction in the required number of vehicle parking spaces to 68 spaces rather than zero spaces as requested. All other incentives/concessions meet requisite qualifications pursuant to State Law for approval.

Granting the concessions as specified above is appropriate given that concession/incentives will result in identifiable and actual cost reductions to provide for affordable housing costs. Findings for the approval of the requested concessions are included with this report.

Requested Waivers

1. **Floor Area Ratio (FAR).** Pursuant to SCCC Section 13.10.323(C) and Table 13.10.323-2, the maximum floor area ratio (FAR) in the RF zone district is 1.5. The project proposes a FAR of about 3.61. The applicant has requested a waiver to allow for the floor area of the building containing six stories and about 91,197 square feet of floor area as proposed.

2. **Building Height and Stories.** Pursuant to County Code Section 13.10.323(C) and Table 13.10.323-2, the maximum building height in the RF zone district is 40 feet. The proposed project includes an overall building height (to top of elevator penthouse) of about 81 feet and 70 feet to top of building roof. The Applicant has requested a waiver to allow for the building containing six stories as proposed.

3. **Setbacks.** A waiver of the setback requirements as required by SCCC Section 13.10.323 and Table 13.10.323-2 is requested. The building is essentially designed to be built to the property lines of the parcel and encroaches into all applicable setbacks.

4. **Vehicle Parking.** A waiver of all County parking standards is requested. The project includes a total of 68 vehicular parking spaces. 22 of the 68 proposed parking spaces are car puzzler (mechanical stacker) spaces and two are ADA spaces. 31 of the 68 proposed parking spaces are designed as compact parking spaces (7.5 feet wide by 16 feet long). The remaining 15 parking spaces are designed as standard parking spaces (8.5 feet wide by 18 feet long). Density Bonus Law prohibits the jurisdiction from imposing a vehicle parking ratio that exceeds one parking space per zero to one bedroom, one and one-half parking spaces for two to three bedrooms, and two and one-half parking spaces for four and more bedrooms. (Gov. Code § 65915(p).) This results in a maximum of 113 parking spaces for the project. Density Bonus Law further permits an Applicant to "request parking incentives or concessions beyond those provided" as an incentive/concession (Gov. Code § 65915(p)(5)). The project includes both a waiver and concession for all County vehicular parking and design standards. Please see the "Parking" Section of this report below for further discussion of parking.

   An Applicant may only "request parking *incentives or concessions* beyond those provided" by Density Bonus Law. (Gov. Code § 65915(p)(5).) Accordingly, a *waiver* may not be granted to reduce the number of parking spaces below what is required by Density Bonus Law, and staff recommends denying this waiver request; however, the waiver for all other County parking standards complies with Density Bonus Law, and must be granted.

5. **Usable Open Space.** Pursuant to SCCC Section 13.10.323(D), common and private open space shall be provided per Table 13.10.323-3 in the RF zone district. Private open space must be directly accessible from the dwelling unit, served at a minimum of 60 square feet per unit for 50% or more of units included in project, with a minimum dimension of 6 feet. The project provides balconies or terraces for private open space for 75 of the 105 proposed dwelling units ranging in size from 38 square feet to 209 square feet; however, at least 50% of the total units (more than 53 of the 105 units) have private open space meeting the minimum 60-square foot minimum area requirement; therefore, the project meets the private usable open space requirement.

   Per Table 13.10.323-3, common open space shall be provided at a quantity of a minimum of 15% of gross site area. For sites larger than ½ acre, common open space shall have a minimum dimension of 20 feet. The amount of common open space required by County Code is 5,094 square feet (15% of 25,471 square feet), and the project provides 3,894 square feet of qualifying common open space provided in a common area terrace on the second story of the building; thus, a waiver is sought from the common open space requirement as the project is deficient in the provision of common open space by about 1,200 square feet overall.

6. **Existing Trees.** SCCC Section 13.11.070(D)(1)(b) requires that existing mature trees are incorporated into the site and landscape design. The project proposes to remove all 39 trees on the property.

7. **Overarching Objective County of Santa Cruz Design Guidelines.** The Santa Cruz County Design Guidelines are used in conjunction with the Santa Cruz County General Plan, County Code, and Design Criteria for streets and frontages. The guidelines provide concepts and best practices for well-designed projects, whereas the General Plan, County Code, and Design Criteria set land use requirements and quantitative development standards that projects are legally required to follow. The Applicant requests waivers from the following OVERARCHING Objective County of Santa Cruz Design Guidelines:

   a. **On-Site Parking** (A4, page 8): Design Guideline: *"Provide on-site parking behind buildings rather than between buildings and street frontages, especially along Main Streets, Multimodal Corridors and Active Connectors."*

      i. **Applicant's Justification:** Parking is provided under the building in the podium. Applies a Density Bonus Law waiver.

   b. **Setbacks** (A5, page 9): Design Guideline: *"Provide street-facing setbacks to ensure space for the pedestrian amenity zone, pedestrian sidewalk zone, and activity zone."*

      i. **Applicant's Justification:** Applies a Density Bonus Law waiver to all setbacks.

   c. **Upper Floor Stepbacks** (B1, page 10): Design Guideline: *"Stepback - setback of an upper floor of a building from a lower floor.*

i. **Applicant's Justification:** Stories 2-6 are set back from the podium at the first story, but the building extends into upper story setbacks. Applies a Density Bonus Law waiver to all setbacks.

d. **Parking and Access**. (D3, page 14) Design Guideline: *"Locate parking areas toward rear of the site or otherwise obstruct from off-site views, while maintaining appropriate access for people with disabilities. On Main Streets, discourage parking lots between street frontages and buildings. On Multimodal Corridors, surface parking lots should occupy less than 50% of any single street frontage. See County Design Criteria and Santa Cruz County Code Chapter 13.16 for parking design requirements."*

i. **Applicant's Justification:** Parking lot does not comply with all objective standards of SCCC 13.16, such as drive aisle width. Applies a Density Bonus Law waiver.

e. **Bike Parking** (D8, page 15): Design Guideline: *"Install shared long and short-term bike parking outside buildings along Multimodal Corridors, Active Connectors and Main Streets, and in interior building locations for on-site residents and workers, if applicable. Provide covered bike parking whenever possible. See SCCC 13.16.040 for bike parking requirements."*

i. **Applicant's Justification:** Provided Class 2 bicycle parking is spaced two feet apart rather than four feet apart. Applies a Density Bonus Law waiver.

f. **Stepped Massing** (F1, page 20) Design Guideline: *"See SCCC 13.10.323 for residential third-story setbacks and SCCC 13.10.333 for setback requirements for commercial buildings adjacent to residential or agricultural developments Table 13.10.323-2 Minimum of 50% of exterior walls of the third story set back at least 10 feet from property setback lines."*

i. **Applicant's Justification:** Applies a Density Bonus Law waiver.

g. **Tree Placement** (G4, page 25) Design Guideline: *"Locate trees to increase shade and provide buffers for parking areas, buildings, and the public realm. For security purposes, openings should be incorporated into the landscape design to provide clear views into sites. California Building Code 5.106.12.1 Surface parking areas. For non-residential and mixed-use projects, shade tree plantings, minimum #10 container size or equal, shall be installed to provide shade over 50% of the parking area within 15 years. California Building Code 5.106.12.2 Landscape areas. For non-residential and mixed-use projects, shade tree plantings, minimum #10 container size or equal, shall be installed to provide shade over 20% of the landscape area within 15 years. Exception: Playfields for organized sport activity are not included in the landscape area calculation. See SCCC 13.11.070(D), SCCC 13.16.060(D) and County Design Criteria for landscape design requirements for sites, streets, and parking areas."*

i. **Applicant's Justification:** See landscape plans for proposed tree locations. The criteria is lengthy and complex. If any objective standard is not met, a waiver is requested for the project as proposed. Along the frontage of the project, all trees are proposed in the right-of-way rather than within the property boundaries. The project will comply with State Law California Building Code requirements.

h. **Utility Placement** (I4, page 31) Design Guideline: *"Either contain (within a building) or fully screen all utility cabinets, meters, and backflow prevention devices on Active Connectors and Main Streets to reduce visual impacts. Screening mechanisms can include landscaping, fencing, low walls, or other techniques."*

i. **Applicant's Justification:** Utilities are placed per project requirements. Rooftop mechanical shall be screened. Pad mounted transformers are placed per PG&E requirements. Applies Density Bonus Law waiver.

i. **Residential Unit Pedestrian Access** (D2, page 14): Design Guideline: "*Orient residential buildings so that the majority of ground floor units have individual entries from public streets. This encourages a safe and activated streetscape".*

i. **Applicant's Justification:** None of the residential units on the ground floor front on public streets.

8. **Multifamily Residential Objective County of Santa Cruz Design Guidelines.** The Santa Cruz County Design Guidelines are used in conjunction with the Santa Cruz County General Plan, County Code, and Design Criteria for streets and frontages. The guidelines provide ideas and best practices for well-designed projects, whereas the General Plan, County Code, and Design Criteria set land use requirements and quantitative development standards that projects are legally required to follow. The Applicant requests waivers from the following MULTIFAMILY RESIDENTIAL Objective County of Santa Cruz Design Guidelines:

a. **Building Placement** – Neighborhoods (A1, page 36) Design Guideline: "Within residential neighborhoods, locate multifamily buildings in the center front of the site, especially if other buildings in the neighborhood follow this pattern. Locate front yards along public streets to assist in cultivating a sense of community and neighborhood feel."

i. **Applicant's Justification:** Podium building takes up the entire site. Applies Density Bonus Law waiver.

b. **Building Orientation** (A3, page 36) Design Guideline: "Orient buildings towards public streets with the primary entrance to housing units on the ground floor directly accessible from an adjacent sidewalk. Internally-facing buildings with primary entrances oriented toward a common space should prioritize the pedestrian experience. Primary building facades and entrances should not face parking areas when the option to face the street is available.

i. **Applicant's Justification:** No ground floor living units proposed. No ability to comply for a podium project. Applies Density Bonus Law waiver.

c. **Building Mass** (B1, page 38) Design Guideline: "Encourage highest building height and mass to be located near the center of the site and building footprint. Building mass should taper from the center of the site toward the property lines to emulate the scale and style of single-family residential development and allow for solar access to open spaces, especially within neighborhoods. Design upper floor mass to complement neighborhood scale by incorporating design elements such as upper floor stepbacks and gable and hip roof forms. See SCCC 13.10.323(C) for third floor stepback requirements."

i. **Applicant's Justification**: Building mass steps back with slope of site with tallest portion of the building facing the street and shorter sides facing neighboring properties.

d. **Building Stepbacks** (B5, page 40) Design Guideline: "Upper floor building mass should be stepped back along internal frontages to provide solar access to common open spaces, internal drives, and other on-site spaces. Upper-floor stepbacks along frontages should be incorporated along Local Residential Streets. See SCCC 13.10.323(C) for third floor stepback requirements."

i. **Applicant's Justification:** The project applies a Density Bonus Law waiver to third story and upper stories stepback requirements.

e. **Private Open Space** (C1, page 43) Design Guideline: "On sites zoned Residential Multifamily (RM), provide 60 square feet of private open space for every unit. Site buildings to accommodate stoops and porches along ground floor unit entrances, including internal-facing front yards. On sites zoned Residential Flex (RF), higher density development may not allow for private open space for every unit. Wherever private open space is provided for multifamily projects, the minimum dimension should be six feet in order to ensure that the space is usable"

i. **Applicant's Justification:** No ground floor living units proposed. No ability to comply for a podium project.

f. **Common Open Space** (C2 page 43) Design Guideline: "On sites zoned RM, provide 200 square feet of common open space per unit. On sites zoned RF, provide at least 15% of gross site area as private or common open space. Locate common open space areas in front and side yard areas when possible. On larger sites with multiple structures or along Multimodal Corridors, explore centrally-located common open spaces, such as plazas, that are interconnected with a network of pedestrian paths to individual private open spaces. Wherever common open space is provided, the minimum dimension should be 15-20 feet to ensure that the space is usable. See SCCC 13.10.323(D) for usable open space requirements.

i. **Applicant's Justification:** "RF zoning applies per Builder's Remedy. Common open space square footage requirements not met. Applies Density Bonus Law waiver.

As referenced in SCCC Section 17.12.050, Density Bonus Law allows applicants to request waivers of any development standards that have the effect of physically precluding the construction of an eligible housing development at the density proposed. There is no limit to the number of waivers that may be requested. The Applicant is requesting the above-listed waivers for this project. To achieve the proposed density of 105 multifamily rental units with six affordable units, reduced and revised site and development standards are necessary.

The Applicant has provided adequate information to establish eligibility for the requested waivers of development standards. Accordingly, granting these waivers is appropriate given that the project site is constrained in size respective to the number of multifamily units proposed. Granting these waivers would allow the project, as designed, to provide 105 multifamily units with parking and open space, along with the necessary site improvements. Findings for the approval of the requested waivers are included with this report.

In addition, the Builder's Remedy provision of the HAA prohibits the County from relying on inconsistency with Zoning and General Plan standards as a basis for denial of a housing development project for extremely low, very low-, low-, or moderate-income households.

Zoning & General Plan Consistency

A Lot Line Adjustment (Application No. 241094) was approved on April 11, 2024, to transfer 2,804 square feet from an adjacent parcel (APN 102-061-10) to APN 025-031-37. A deed of conveyance in conformance with the approved Lot Line Adjustment was filed with the County Recorder. The property owner of APN 102-061-10 (LHO SANTA CRUZ ONE, L.P.) has also provided an Owner-Agent Authorization for the processing of this project. As adjusted per the Lot Line Adjustment, the subject property is a 25,471 square foot lot, located in the PA-Min (Professional Administrative Office - Ministerial Combining District) zone district and RM-2.5 (Multifamily Residential - 2,500 square feet per unit) zone district. These designations allow residential uses. The PA-Min zone district is consistent with the site's C-O (Professional Office) General Plan designation, and the RM-2.5 zone district is consistent with the R-UH (Urban High Density Residential) General Plan designation. Though the site is located in the Ministerial Combining District, the project does not minimum criteria for ministerial processing as outlined in SCCC 13.10.494-13.10.497.

The C-O General Plan designation allows a maximum density of 45 units per acre (up to 80 percent of building square footage) and the R-UH designation allows a maximum density of 30 units per acre. Although the proposed density of 105 dwelling units on the 0.58-acre project site exceeds the allowable density in the General Plan, pursuant to the Builder's Remedy provisions of the HAA, the County may not disapprove the project based on the project's noncompliance with this General Plan density standard.

The proposed project is consistent with several General Plan policies. Specifically, the project supports the following General Plan policies:

- **Housing Element - Policy H-1.3 (AFFH)(PRO)** Minimum Density Standards. Ensure that new residential and mixed-use developments in multi-family zones, including mixed-use zones, are designed to achieve residential densities equal to at least 75% of the maximum allowable density on the site, unless the Approving Body makes a finding that unusual site conditions exist that render that density infeasible, and no alternate design and/or site layout that could achieve this minimum density would be feasible on the subject site. When this policy is applied to proposed horizontal mixed-use developments, the minimum density standard shall apply only to the portion of the site offered by its owner (or proposed by the applicant) for housing development.

  The proposed project is a residential development that meets and exceeds maximum allowable density on the site, and as such meets this policy.

- **BE-4.3.3 (EJ) Deprioritize Vehicles.** Wherever possible, locate parking lots behind buildings. Screen parking lots located adjacent to residential parcels with fences, walls, and/or landscaping. Encourage bicycle storage, shared parking structures, and park and ride lots. Provide incentives to developers to provide alternatives to surface parking lots, such as underground garages, multi-story above-ground garages, and podium parking.

  The project will provide podium parking.

- **AM-1.1.2 (EJ) Transit Infill Development.** Prioritize infill development near high-quality transit, including near the Santa Cruz Branch Line rail corridor, and near job centers that reduce urban sprawl and encourage the reduction of VMT per person.

  The project will provide infill development near major employment centers.

Zoning

Although the project is inconsistent with a number of the development standards in the in the PA-Min and RM-2.5 zone districts, pursuant to the Builder's Remedy provisions of the HAA, the County may not disapprove the project based on the project's noncompliance with these development standards. Subdivision (f) of the HAA allows the County to require that projects comply with applicable standards, and allows the development proponent to identify any objective, quantifiable, written development standards, conditions, and policies associated with a different general plan designation or zoning classification within that jurisdiction, that facilitate the project's density and unit type, and those shall apply. In this case, the Applicant has identified standards that are applicable to the project would be the RF (Residential Flex) zone district and the R-UHF (Urban High Flex) General Plan designation. Table 4 provided below outlines applicable site development standards for the project:

Table 4: Site Development Standards

Standard	Requirement			Proposed	Waiver or Concession Applied
Maximum Allowed Density	About 26 units			105 units	
Maximum Floor Area Ratio (FAR)	PA	RM 2.5	**RF**	3.61	Waiver
	1.5	0.7	1.5		
Maximum Parcel Coverage	PA	RM 2.5	**RF**	85%	
	N/A	45%	N/A		
Minimum Setbacks	PA	RM 2.5	**RF**		
Front	10 ft	15 ft	10 ft	0 ft	Waiver
Side	10 ft	5 ft	5 ft	0 ft	Waiver
Rear	10 ft	15 ft	15 ft	0 ft	Waiver
Garage Entrance	N/A	18 ft	18 ft	About 21 ft	
Third Story Setback	Minimum of 50% of exterior walls of the third story set back at least 10 feet from property setback lines Upper Stories Side Yard Setback in RF: 15 feet Upper Stories Rear Yard Setback in RF: 25 feet			Upper Stories Side Yard Setback: about 5 feet Upper Stories Rear Yard Setback: about 3 feet 10 inches	Waiver
Maximum Height Limit	PA	RM 2.5	**RF**	70 feet to roof, 81 feet to top of stair/elevator penthouse	Waiver
	40 ft	35 ft	40 ft		
Maximum Stories	PA	RM 2.5	**RF**	6 stories	Waiver
	3	3	3		
Minimum Usable Open Space	PA	RM 2.5	**RF**	3,894 square feet of common usable open space (15% of gross site area) provided. Private usable open space (balconies and terraces) for 75 units provided.	Waiver
	50 sq ft per dwelling	200 sq ft common open space or 60 sq. ft. private open space per unit	15% of gross site area common open space and 60 sq. ft. per unit for 50% of all units.		

Standard	Requirement	Proposed	Waiver or Concession Applied
Minimum Vehicle parking	Units less than 750 sq. ft.: 1 space per unit. Units greater than 750 sq. ft.: 2 spaces per unit (Total residential spaces required: 115) 20% guest parking required (Total guest parking required: 23) Total parking required: 138 parking spaces	68 garage parking spaces	Concession & Waiver
Minimum Bicycle Parking	1 Class I bike parking space + 20% guest bike parking 1 Class II bike parking space per 4 units Total bike parking required: 126 Class I bike parking spaces 26 Class II bike parking spaces	127 Class I bike parking spaces 26 Class II bike parking spaces	Waiver

Project Design

The project features a contemporary multifamily design with clean lines, flat roof, and the use of mixed materials. The building mass is modulated in a series of rectangular volumes staggered from the Paul Sweet frontage, creating visual interest. The material palette for the project primarily includes cement paneling, stucco, and metal cladding. The lower portion of the building is concrete, giving it a well-grounded base, and the main pedestrian entrance is clearly indicated at the center of the front façade. The garage entrance for vehicular access is located on the southern side of the frontage, leading to the parking garage. Per SCCC Section 13.11.060(B), parking within structures, including basement parking, is encouraged in order to minimize asphalt pavement and maximize open areas, such as the communal terrace located above the podium parking garage. The visual impact of the parking structure is integrated into the design of the building and further reduced by landscaping.

Landscaping is proposed along the street frontage, which softens the base of the building. Planting along the frontage would include a mix of trees, shrubs, perennials, grasses and trailing plants, and a mix of native and non-native plants (see Sheet L1.1 of the plan set, Exhibit D). A large communal terrace, which is visible from the street, is located on the floor level of the second story of the building offering outdoor amenity space for its residents. The terrace will include landscaping planters and seating areas for passive uses. Planting on the terrace would include a mix of trees,

shrubs, perennials, grasses and trailing plants, and a mix of native and non-native plants (see Sheet L1.2 of the plan set, Exhibit D). Additional bicycle parking spaces are also located on the common usable open space terrace.

Figure 1: Building Rendering Viewed from Paul Sweet Road

The project includes a total of 3,894 square feet of common open space and 75 private outdoor spaces provided via terraces and balconies that can be used by future residents and guests. Plan sheets GP0.04 and GP0.05 of the plan set (Exhibit D) illustrate the open space to be provided by the project.

At the street level, the project frontage would include a sidewalk and landscaping. The sidewalk would measure four feet in width and would tie into the existing sidewalk located to the south of the project site. The sidewalk would extend across the project frontage, terminating at the north side of the project site. No sidewalk currently exists along the parcel to the north of the project site. Landscaping is proposed along the interior side of the sidewalk and in planters in front of the proposed building.

Other Site Improvements

Other project improvements include on- and off-site drainage and sewer infrastructure improvements. The proposed project will create and/or replace more than 26,000 square feet of impervious area and is therefore classified as a large project per the County Design Criteria. The project proposal includes biofiltration treatment sized to filter runoff produced from a 0.2 inch/hour rain event. The basins have also been sized with sufficient volume to detain runoff from a post development 25-year rainfall event while limiting release to the predevelopment 10-year,

15-minute flow rates (the design storm specified in the County Design Criteria). Discharge rates are limited orifice outlet control structures. Retention and infiltration of stormwater on the site was determined to be infeasible based on the Geotechnical Investigation by Rock Solid Engineering. The project would be conditioned to ensure requirements of the Public Works Division Stormwater Management Section are met.

All utilities are available to serve the proposed development, as indicated in the will-serve letters from the City of Santa Cruz Water Department (Exhibit H) and the Santa Cruz County Sanitation District (Exhibit I).

Construction would require approximate cut and fill volumes of 10,745 cubic yards and 1 cubic yard respectively. The Geotechnical Investigation Report by Rock Solid Engineering (May 2023) has been reviewed and accepted, the acceptance letter is provided as Exhibit K.

Vehicular Parking

The proposed project includes a podium parking garage with a total of 68 parking spaces. A portion of the parking garage is subgrade to allow for a portion of a car puzzler. A "puzzler" is a mechanical parking stacker that allows sideways movement within the stacker, reducing the space needed for parking stalls. Two of the 68 parking spaces are designated as Americans with Disabilities Act (ADA) spaces. The project is non-compliant with SCCC Section 13.16.050, which requires 115 parking spaces for the residential units and 23 guest parking spaces for a total of 138 parking spaces. However, as detailed in the "Written Requests for Concessions, Incentives, and Waivers" section of this staff report above, the Applicant is requesting a concession and a waiver of the parking ratio and parking design requirements.

A County may impose a higher vehicular parking ratio, but only if it has conducted an independent areawide or jurisdiction-wide parking study in the last seven years, and made findings that the study supports the need for a higher parking ratio. (Gov. Code § 65915(p)(7).) The County has not conducted a qualifying parking study, and therefore a higher parking ratio cannot be imposed.

Notwithstanding the above-noted inconsistencies with the parking standards, pursuant to the Builder's Remedy provisions of the HAA, the County may not disapprove the project based on its noncompliance in this regard.

Transportation and Circulation

Traffic

A traffic analysis report (Linscott, Law & Greenspan, Engineers, dated May 16, 2025) was provided for the proposed project. The project is expected to generate about 477 new daily trips, with 39 morning peak hour trips (9 in, 30 out) and 41 evening peak hour trips (25 in, 16 out).

Traffic conditions at the study intersection were also evaluated using level of service (LOS). According to the General Plan, LOS C is considered as the objective, but it accepts LOS D as the minimum acceptable level of service at both signalized and unsignalized intersections where costs, right-of-way requirements, or environmental impacts of maintaining LOS under this policy are excessive, capacity enhancement may be considered infeasible. A development is considered to

create an operational deficiency at a signalized intersection if at peak hour, either of the following occurs: (1) The LOS at the intersection degrades from an acceptable level (LOS D or better for local intersections under no-project conditions to an unacceptable level (LOS E or F) under project conditions, or (2) the level of service at the intersection is an unacceptable level (LOS E or F) under no-project conditions and the volume capacity (v/c) ratio of the sum of all critical movements at the intersection increases by one percent or more with the project.

The traffic report indicates the key study intersection (Paul Sweet Road/Highway 1 Westbound Ramps at Soquel Drive) will continue to operate at acceptable levels with the addition of the project-generated traffic in the horizon year of 2045. The minimum acceptable LOS is "D" and both intersections would operate at LOS "D" with project traffic conditions. The development is subject to Live Oak Transportation and Roadside Improvement fees at the rate per the County Unified Fee Schedule vested on April 22, 2024 (SB 330 vested date) at $4,200, split evenly between Transportation and Roadside Improvements, for each new unit created.

Vehicle Miles Traveled (VMT)

The County of Santa Cruz adopted a policy establishing vehicles miles traveled (VMT) as the appropriate metric for evaluating transportation-related impacts under the California Environmental Quality Act (CEQA). VMT is a measure of total vehicular travel that accounts for the number of vehicle trips and the length of those trips.

In 2013, Senate Bill (SB) 743 was signed into law by California Governor Jerry Brown with a goal of reducing greenhouse gas (GHG) emissions, which promotes urban infill projects supporting diverse land uses and multimodal transportation networks. One significant outcome resulting from this statute is the removal of automobile delay and congestion (or LOS), as a basis for determining significant transportation impacts under the CEQA.

The Governor's Office of Land Use and Climate Innovation (LCI) selected VMT as the principal measure to replace LOS for determining significant transportation impacts. VMT is a measure of total vehicular travel that accounts for the number of vehicle trips and the length of those trips.

VMT also allows for an analysis of a project's impact throughout the jurisdiction rather than only in the vicinity of the proposed project allowing for a better understanding of the full extent of a project's transportation-related impact. However, SB 743 does not restrict the County of Santa Cruz from using LOS for other planning purposes outside the scope of CEQA.

Project screening is used to determine if a project would be required to conduct a VMT analysis. As detailed in the provided VMT technical analysis and based on the SB 743 Implementation Guidelines for the County of Santa Cruz and the County's TREDLite tool, the VMT for the proposed project is 15.1, which exceeds the threshold of 13.6, thus the project would not screen out of the requirement to provide a VMT analysis. Thus, a VMT technical analysis (Linscott, Law & Greenspan, Engineers, dated May 14, 2025) was provided for the proposed project, on file with the CDI Planning Division.

The County of Santa Cruz TREDLite tool was utilized to determine whether on-site transportation demand management ("TDM") project features may reduce the proposed project's VMT to a less than significant impact. The TREDLite tool provides a 20% VMT reduction achieved by a project

that is designed with a higher density compared to the average residential density in the U.S. The project is designed at a density of about 179 units per acre, exceeding the average residential density in the U.S (9.1 units per acre). As such, the high density of the project reduces the project VMT from 15.1 to 12.1, which is below the threshold of 13.6, thus the project's VMT would result in a less than significant impact.

Streetscape Design

Along the Paul Sweet Road frontage, the existing conditions are a small driveway at the southern end of the property frontage. Paul Sweet Road is a Local County-maintained road. There is no existing sidewalk along the project frontage. The proposed project includes construction of a new driveway for vehicular entry to the podium-level garage entrance. The driveway entrance would meet sight distance requirements per SCCC Section 13.16.093(B). Further, a new six-foot wide sidewalk with a curb within the Paul Sweet Road right-of-way that would connect to the existing sidewalk alignment located to the south of the project frontage is proposed, resulting in a continuous sidewalk connection from the project site along Paul Sweet Road to the Soquel Drive corridor. As conditioned, the project is required to provide a roadway section along the project frontage to include an 11-foot-wide vehicular travel lane, a six-foot-wide bike lane, a 6.625-foot-wide curb and sidewalk (0.625-foot-wide curb and 6-foot-wide sidewalk), and a 4-foot-wide landscape strip.

Pursuant to the Builder's Remedy provisions of the HAA, the County may not require a dedication of land as a condition of approving a housing development project.

Public Outreach/Public Comment

The project Applicant conducted public outreach for the project, including a public neighborhood meeting held on February 25, 2025. Neighbors expressed concerns about potential traffic, parking, and safety, among other comments. The results of the neighborhood meeting are included in Exhibit M. Public comments submitted to the County also included concerns about the size and height of the building, incompatibility of the project with the surrounding neighborhood, traffic and parking impacts, fire hazard and evacuation safety concerns, construction noise impacts to the residents of the Dominican Oaks retirement community, FAA requirements for helicopter access to Dominican Hospital, among other concerns. Public comment in support of the project was received as well. Written correspondence is attached in Exhibit N.

FAA Compliance

The project is located nearby to Dominican Hospital, which has a heliport. To ensure conformance with the Federal Aviation Administration (FAA) regulations, a Condition of Approval (I.F.) has been added requiring notification of the FAA in advance of any construction or alteration of the approved project, as required by the Federal Aviation Regulations, including filing of the FAA Form 7460-1 in accordance with all its requirements. FAA Form 7460-1 shall be included with all Building Permit Applications for construction or alteration of the building.

Construction Impacts

Condition of Approval III.D. has been included to help address public concerns pertaining to construction impacts, for noise, dust and nuisance impacts to surrounding properties during construction. These conditions include limiting all construction to the time between 8:00 am and 5:00 pm on weekdays unless the Building Official has in advance authorized a temporary exception to this time restriction per SCCC 13.15.040(A), performing dust reduction measures consistent with the Monterey Bay Area Air Resources District's control measures, and designating a disturbance coordinator and a 24-hour contact number posted on the job site. The disturbance coordinator shall record all complaints received regarding the construction site, investigate complaints and take remedial action, if necessary, within 24 hours of receipt of the complaint or inquiry.

It is noted, per SCCC 13.15.040(A), noise sources associated with construction, repair, remodeling, or grading of any real property, provided a permit has been obtained from the County as required, and occurs within the specified hours, is exempt from the Noise Ordinance.

Environmental Review – Statutory Exemption

The proposed project has been reviewed for compliance with CEQA pursuant to Public Resources Code (PRC) Section 21080.66 (via AB 130 and SB 131) relating to environmental quality.

PRC Section 21080.66 provides a Statutory Exemption from CEQA for all aspects of a qualifying "housing development project," including any permits and public improvements required for the project. In addition to incorporated cities, this exemption applies in all unincorporated "urban areas."

Tribal notification was conducted for the requisite 60-day period from August 1, 2025, to September 30, 2025, pursuant to PRC Section 21080.66(b). Two Tribes responded to the noticing; however, no Tribe accepted the invitation to engage in formal consultation with the County with respect to the proposed project. Included in their emailed response, the Amah Mutsun Band of San Juan Bautista provided recommended provisions to address discovery of a tribal cultural resource during construction, which have been added as conditions of approval for this project.

As further detailed in the attached Notice of Exemption (Exhibit A), the project meets the criteria of PRC Section 21080.66, and therefore it is exempt from CEQA and no further environmental analysis is required.

Final Action Required per PRC Section 21080.66

This project utilizes CEQA provisions per PRC Section 21080.66. A 60-day formal tribal notification period was intiated on August 1st, 2025 and terminated on September 30th, 2025. Though the lead agency must approve or disapprove the project within 30 days from the termination of the tribal notification period (by October 30th, 2025), the Applicant has agreed to the Planning Commission hearing date of January 14, 2026. The timeline does not include appeals.

Conclusion

The project is consistent with some development standards, achieves General Plan and Housing Element goals by increasing market-rate and affordable housing opportunities in the County, and aids the County in meeting its RHNA requirements. Where the project is inconsistent with some development standards, such inconsistencies are not a basis for disapproval of the project due to applicability of the HAA.

Please see Exhibit "B" ("Findings") for a complete listing of findings and evidence related to the above discussion.

Staff Recommendation

- Determine that the proposal is exempt from further Environmental Review under the California Environmental Quality Act.

- Deny concession request in-part for the requested reduction in the number of required parking spaces to zero spaces, instead grant a concession reducing the number of required vehicle parking spaces to 68 spaces.

- Deny waiver request in-part to reduce the number of parking spaces below what is required by State Density Bonus Law, as the project shall instead utilize a concession to reduce the number of required parking spaces; however, grant the waiver for all other County parking standards.

- Grant remaining concession and waiver requests.

- **APPROVAL** of Application Number 241360, based on the attached findings and conditions.

Supplementary reports and information referred to in this report are on file and available for viewing at the Santa Cruz County Planning Division, and are hereby made a part of the administrative record for the proposed project.

The County Code and General Plan, as well as hearing agendas and additional information are available online at: www.sccoplanning.com

Report Prepared By: _____

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Exhibits

A. Statutory Exemption (CEQA determination)
B. Findings
C. Conditions
D. Project Plans
E. Assessor's, Location, Zoning and General Plan Maps
F. Parcel Information
G. Objective Design Guidelines Standards Analysis
H. City of Santa Cruz Will-Serve Letter
I. Santa Cruz County Sanitation District Will-Serve Letter
J. Biotic Report Review Letter, Biotic Report, Arborist Report
K. Soils Report Review Letter
L. Central Fire District Plan Approval, dated December 22, 2025
M. Results of the Neighborhood Meeting
N. Public Comments

CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION

The Santa Cruz County Planning Division has reviewed the project described below and has determined that it is exempt from the provisions of CEQA as specified in Public Resources Code (PRC) Section 21080.66 for the reason(s) which have been specified in this document.

Application Number: 241360
Assessor Parcel Number: 025-013-37 & 102-061-10
Project Location: 3500 Paul Sweet Road, Santa Cruz, CA

Project Description: Proposal to demolish one existing residential dwelling unit and construct 105 units within a six-story multifamily building. The project includes a 32.5-percent Density Bonus in exchange for the provision of six affordable units (comprising of six Extremely Low (ELI) units). Requires approval of a Site Development Permit pursuant to SB 330 and Builder's Remedy (Gov. Code § 65589.5) and Density Bonus pursuant to Government Code Section 65915. The project site is located to the east of Paul Sweet Road at 3500 Paul Sweet Road in Santa Cruz.

Person or Agency Proposing Project: Clay Toombs for Workbench

Contact Phone Number: 831-227-2217 ext. 310

A. _____ The proposed activity is not a project under CEQA Guidelines Section 15378.

B. _____ The proposed activity is not subject to CEQA as specified under CEQA Guidelines Section 15060 (c).

C. _____ **Ministerial Project** involving only the use of fixed standards or objective measurements without personal judgment.

D. __X__ **Statutory Exemption** other than a Ministerial Project - Public Resources Code (PRC) Section 21080.66

E. ___ **Categorical Exemption**

F. Reasons why the project is exempt:

The project is statutorily exempt from the California Environmental Quality Act (CEQA) pursuant to Public Resources Code (PRC) Section 21080.66. This exemption applies to projects consistent with the applicable requirements of the General Plan and Zoning Ordinance. Pursuant to the Housing Accountability Act (HAA), the County is restricted from denying the project, reducing its density, or rendering it infeasable based on inconsistencies with the Zoning Ordinance or General Plan. Therefore, any existing zoning requirements and development standards that the project is not in compliance with are not "applicable" within the meaning of PRC Section 21080.66. The project is found to be consistent with the Zoning Ordinance and General Plan. Also, the approval of a density bonus, incentives or concessions, waivers, or reductions of development or parking standards shall not be grounds for determining that the project is inconsistent with the General Plan or Zoning Ordinance. The project also meets all other criteria. The project is a

builder's remedy "housing development project," occurs in an unincorporated "urban area" on a site that is no more than five acres in size; is located on a project site that has been previously developed; is substantially surrounded by urban uses; contains at least a minimum density of 10 units per acre, does not involve the demolition of a listed historic structure existing as of the date of submittal of the preliminary application (Historic Evaluation by PAST Consultants LLC, dated January 16, 2024 on file with the CDI Planning Division), is not located on farmland, wetlands, in a state responsibility area or a very high fire hazard severity zone, a hazardous waste site, earthquake fault zone, flood hazard area, regulatory floodway, in an adopted natural conservation plan/habitat conservation plan/natural resource protection plan, does not contain habitat for protected species identified as candidate, sensitive, or species of special status by state or federal agencies. The biotic report (Arborist Report and Tree Protection Plan dated September 11, 2025 prepared by Aesculus Arboricultural Consulting, a Biotic Report dated March 4, 2025 prepared by EMC Planning Group, and a Vegetation Communities and Land Cover Memo dated September 2025 prepared by Dudek for APN 025-013-37) concludes that the Study Area does not support habitat for federally and/or state protected plant or animal species. A Roosting Bat Survey (Dudek, November 12, 2025) was also completed for the site in which no special status bat species, or their sign were documented during the survey. No special-status plant or animal species were identified in the study area. In addition, there are no wetlands or riparian corridors on or immediately adjacent to the property.

A vehicle miles traveled (VMT) technical analysis (Linscott, Law & Greenspan, Engineers, dated May 14, 2025) was provided for the proposed project. As detailed in the analysis and based on the SB 743 Implementation Guidelines for the County of Santa Cruz and the County's TREDLite tool, the VMT for the proposed project is 15.1, which exceeds the threshold of 13.6, thus the project would not screen out of the requirement to provide a VMT analysis, thus a VMT technical analysis was provided for the project.

The County of Santa Cruz TREDLite tool was utilized to determine whether on-site transportation demand management ("TDM") features may reduce the proposed project's VMT to a less than significant impact. The TREDLite tool provides a 20 percent VMT reduction achieved by a project that is designed with a higher density compared to the average residential density in the U.S. The project is designed at a density of about 179 units per acre, exceeding the average residential density in the U.S (9.1 units per acre). As such, the high density of the project reduces the project VMT from 15.1 to 12.1, which is below the threshold of 13.6, thus the project's VMT would result in a less than significant impact.

A 60-day formal tribal notification period was intiated on August 1st, 2025 and terminated on September 30th, 2025. Two tribes provided responses but formal consultations were not requested by any tribes during the notification period. Standard conditions of approval for tribal monitoring during ground-disturbing activities would apply to the project.

In conformance with PRC Section 21080.66, a condition of approval for the development has been included as part of the project approval requiring the development proponent to complete a phase I environmental assessment, as defined in Section 78090 of the Health and Safety Code.

_____ Date:_____

Jonathan DiSalvo, Project Planner

EXHIBIT A

Discretionary Permit Findings

(a) Health and Safety. The proposed location of the project and the conditions under which it would be developed, operated, or maintained will not be detrimental to the health, safety, or welfare of persons residing or working in the neighborhood or the general public and will not be materially injurious to properties or improvements in the vicinity.

This finding can be made, in that the project is located in an area designated for residential uses. Construction will comply with prevailing building technology, the California Building Code, and the County Building ordinance to ensure that the project will not be detrimental to the health, safety, or welfare of persons residing or working in the neighborhood or the general public, and will not be materially injurious to properties or improvements in the vicinity.

(b) Zoning Conformance. The proposed location of the project and the conditions under which it would be developed, operated, or maintained will be in substantial conformance with the intent and requirements of all pertinent County ordinances and the purpose of the zone district in which the site is located.

This finding can be made, in that although the project is inconsistent with a number of the development standards in the PA-Min (Professional Administrative Office - Ministerial Combining District) zone district and RM-2.5 (Multifamily Residential - 2,500 square foot minimum lot size) zone districts, pursuant to the Builder's Remedy provisions of the HAA, the County may not disapprove the project based on the project's noncompliance with these standards. Subdivision (f) of the HAA allows the County to require that projects comply with applicable standards, and per Government Code Section 65589.5(f)(6) the development proponent may identify any objective, quantifiable, written development standards, conditions, and policies associated with a different general plan designation or zoning classification within that jurisdiction, that facilitate the projects density and unit type, and those shall apply. In this case, the standards that are applicable to the project have been identified as the RF (Residential Flex) zone district and the R-UHF (Urban High Flex) General Plan designation. Where the project is inconsistent, such inconsistencies are not a basis for disapproval of the project due to applicability of the HAA. Additionally, a project that utilizes density bonus is considered consistent with the General Plan and zoning, regardless of any granted waivers or concessions.

Consistent with its intent to facilitate the approval of housing, the HAA limits the County's ability to deny or condition a housing development project for extremely low, very low-, low-, or moderate-income households in a manner that renders the project infeasible for affordable housing development (Gov. Code § 65589.5(d)). In addition, the Builder's Remedy provision of the HAA prohibits the County from relying on inconsistency with Zoning and General Plan standards as a basis for denial of a housing development project for extremely low, very low-, low-, or moderate-income households.

(c) General Plan Conformance. The proposed project is in substantial conformance with the intent, goals, objectives, and policies of all elements of the County General Plan and any specific plan which has been adopted for the area.

This finding can be made, in that though the proposed multifamily residential use is not in substantial conformance with the use and density requirements specified for the C-O (Professional

Office) or R-UH (Urban High Density Residential) land use designation in the County General Plan, pursuant to the Builder's Remedy provisions of the HAA, the County may not disapprove the project based on the project's noncompliance with these standards. Subdivision (f) of the HAA allows the County to require that projects comply with applicable standards, and per Government Code Section 65589.5(f)(6) the development proponent may identify any objective, quantifiable, written development standards, conditions, and policies associated with a different general plan designation or zoning classification within that jurisdiction, that facilitate the projects density and unit type, and those shall apply. In this case, the standards that are applicable to the project have been identified as the RF (Residential Flex) zone district and the R-UHF (Urban High Flex) General Plan designation. Where the project is inconsistent, such inconsistencies are not a basis for disapproval of the project due to applicability of the HAA. Additionally, a project that utilizes density bonus is considered consistent with the General Plan and zoning, regardless of any granted waivers or concessions.

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A specific plan has not been adopted for this portion of the County.

(d) CEQA Conformance. The proposed project complies with the requirements of the California Environmental Quality Act (CEQA) and any significant adverse impacts on the natural environment will be mitigated pursuant to CEQA.

This finding can be made, in that the project has been determined to be exempt from further review under the California Environmental Quality Act, as indicated in the Notice of Exemption for this project.

(e) Utilities and Traffic Impacts. The proposed use will not overload utilities, result in inefficient or wasteful use of energy, or generate more than the acceptable level of traffic on the streets in the vicinity.

This finding can be made, in that the proposed project, which is in the Urban Services Line, would be served by existing public utilities, including the Santa Cruz County Sanitation District for wastewater collection and stormwater drainage, the City of Santa Cruz Water Department for water service. Will-serve letters have been provided by the City of Santa Cruz Water Department (Exhibit H) and Santa Cruz County Sanitation District (Exhibit I) for the project. In addition, all construction will comply with prevailing building technology, the California Building Code, and the County Building ordinance to ensure that the project will not overload utilities or otherwise result in an inefficient or wasteful use of energy.

A traffic analysis report (Linscott, Law & Greenspan, Engineers, dated May 16, 2025) was provided for the proposed project. The project is expected to generate about 477 new daily trips, with 39 morning peak hour trips (9 in, 30 out) and 41 evening peak hour trips (25 in, 16 out).

Traffic conditions at the study intersection were also evaluated using level of service (LOS). According to the General Plan, LOS C is considered as the objective, but it accepts LOS D as the minimum acceptable level of service at both signalized and unsignalized intersections where costs, right-of-way requirements, or environmental impacts of maintaining LOS under this policy are excessive, capacity enhancement may be considered infeasible. A development is considered to create an operational deficiency at a signalized intersection if for either peak hour, either of the following occurs: (1) The level of service at the intersection degrades from an acceptable level (LOS D or better for local intersections under no-project conditions to an unacceptable level (LOS E or F) under project conditions, or (2) the level of service at the intersection is an unacceptable level (LOS E or F) under no-project conditions and the volume capacity (v/c) ratio of the sum of all critical movements at the intersection increases by one percent or more with the project.

The traffic report indicates the key study intersection (Paul Sweet Road/Highway 1 Westbound Ramps at Soquel Drive) will continue to operate at acceptable levels with the addition of the project-generated traffic in the horizon year of 2045. The minimum acceptable LOS is "D" and both intersections would operate at LOS "D" with project traffic conditions. The development is subject to Live Oak Transportation Improvement (TIA) fees at the rate per the County Unified Fee Schedule vested on April 22, 2024 (SB 330 vested date) at $4,200 for each new unit created.

The increase in traffic generated by the proposed project will therefore not adversely impact existing roads or intersections in the surrounding area, and the project will not overload utilities or otherwise result in an inefficient or wasteful use of energy.

(f) Neighborhood Compatibility. The proposed use will be compatible with the existing and proposed land uses, land use intensities, and dwelling unit densities of the neighborhood, as designated by the General Plan and Local Coastal Program and implementing ordinances.

This finding can be made, in that the proposed multifamily residential project utilizes Builder's Remedy per Government Code Section 65589.5 and Density Bonus per Government Code Section 65915 and though the proposed multifamily residential use is not in substantial conformance with the use and density requirements specified for the C-O (Professional Office) or R-UH (Urban High Density Residential) land use designation in the County General Plan, pursuant to the Builder's Remedy provisions of the HAA, the County may not disapprove the project based on the project's noncompliance with these standards in regard to land use, land use intensities, and dwelling unit densities as designated by the General Plan and Local Coastal Program and implementing ordinances.

(g) Local Coastal Program Consistency. For proposed projects located within the coastal zone, the proposed project is consistent with the provisions of the certified Local Coastal Program.

This finding is not required, in that the project site is not located within the coastal zone.

Site Development Permit Findings

(a) Siting and Neighborhood Context. The proposed development is designed and located on the site so that it will complement and harmonize with the physical design aspects of existing and proposed development in the neighborhood, as designated by the General Plan and Local Coastal Program and implementing ordinances.

This finding can be made, in that the proposed multifamily residential project utilizes Builder's Remedy per Government Code Section 65589.5 and Density Bonus per Gov. Code Section 65915 and though the project is not in substantial conformance with the use and density requirements specified for the C-O (Professional Office) or R-UH (Urban High Density Residential) land use designation in the County General Plan, pursuant to the Builder's Remedy provisions of the HAA, the County may not disapprove the project based on the project's noncompliance with these standards in regard to land use, land use intensities, and dwelling unit densities as designated by the General Plan and Local Coastal Program and implementing ordinances. Additionally, a project that utilizes density bonus is considered consistent with the General Plan and zoning, regardless of any granted waivers or concessions.

(b) Design. The proposed development is in substantial conformance with applicable principles in the adopted Countywide Design Guidelines, except as prohibited by site constraints, and any other applicable requirements of SCCC 13.11 (Site Development and Design Review). If located in the Coastal Zone, the site plan and building design are also in substantial conformance with the policies of the Local Coastal Program and coastal regulations of SCCC 13.20.

This finding can be made, in that the proposed multifamily residential project utilizes Builder's Remedy per Government Code Section 65589.5 and Density Bonus per Government Code Section 65915 and though the project is not in substantial conformance with the design requirements specified for the C-O (Professional Office) or R-UH (Urban High Density Residential) land use designation in the County General Plan, pursuant to the Builder's Remedy provisions of the HAA, the County may not disapprove the project based on the project's noncompliance with these standards in regard to design as designated by the General Plan and Local Coastal Program and implementing ordinances. Additionally, a project that utilizes density bonus is considered consistent with the General Plan and zoning, regardless of any granted waivers or concessions.

Residential Density Bonus Findings

1. The housing development is eligible for the density bonus and any incentives, concessions, parking reductions or waivers requested.

This finding can be made in that the project includes six affordable units (7% of the Builder's Remedy 2.0 base density of 79 units), consisting of six Extremely Low (ELI) units. Providing six ELI units adds a three percent extra credit, for a total of 10 % affordable units, which qualifies the project for a 32.5% density bonus, equal to 26 units, per the State Density Bonus Law, bringing total density to 105 units (79 base units plus 26 density bonus units).

Density Bonus Law allows Applicants to request specific incentives or concessions. As proposed, the project is eligible for a total of four concessions or incentives and unlimited waivers.

2. Any requested incentive or concession will result in identifiable, financially sufficient, and actual cost reductions.

This finding can be made in that all the requested concessions would result in actual cost reductions for the project. Local agencies cannot require applicants for Density Bonus projects to submit pro formas or other documentation to prove that requested incentives/concessions are necessary to make the housing development financially feasible. As detailed in the project application and staff report the requested concessions/incentives include requests to expedite any appeal process, for priority processing, and to reduce the parking requirement to zero spaces. While all requested concessions would result in cost reductions by reducing carrying costs, fees to consultants, and increases in construction costs due to inflation, it is recommended that the requested concession/incentive to reduce the parking requirement to zero spaces is denied in part. Under the County Code, 115 resident and 23 guest spaces would be required. Under State Density Bonus Law, this requirement is reduced to 113 spaces. SDBL further permits an Applicant to "request parking incentives or concessions beyond those provided" as an incentive/ concession. (Gov. Code § 65915(p)(5).) The Project is designed to include 68 total vehicle parking spaces. This indicates that any parking reduction below 68 spaces would not result in identifiable and actual cost reductions. Accordingly, Staff recommends granting an incentive/ concession for a reduction in the required number of vehicle parking spaces to 68 spaces rather than zero spaces.

3. If the density bonus is based all or in part on donation of land, a finding that all the requirements included in SCCC 17.12.070 have been met.

This finding is not applicable as the project does not propose the donation of land.

4. If the density bonus or incentive is based all or in part on the inclusion of a child care facility, a finding that all the requirements included in SCCC 17.12.080 have been met.

This finding is not applicable as the project does not propose a childcare facility.

5. If the density bonus or incentive is based all or in part on the inclusion of affordable units as part of a condominium conversion, a finding that all the requirements included in Government Code Section 65915.5 have been met.

This finding is not applicable in that the project does not involve a condominium conversion.

6. If an incentive includes mixed-use development, a finding that nonresidential land uses will reduce the cost of the housing development and that the nonresidential land uses are compatible with the housing development and the existing or planned development in the area.

This finding is not applicable as the project does not propose a mixed-use development.

7. If a waiver is requested, a finding that the development standards for which the waiver is requested would have the effect of physically precluding the construction of the housing development with the density bonus and incentives and concessions permitted.

This finding can be made in that the development standards for which the waivers are requested would have the effect of physically precluding the construction of the project as proposed with the density bonus and incentives and concessions permitted.

To achieve the project as designed at the proposed density of 105 multifamily units with six affordable units, these waivers are required to allow the project. Granting these waivers is appropriate given that the parcel is constrained due to the number of units proposed along with the necessary associated site improvements such as access, parking, and open space. Additionally, the residential units would contain bedrooms of a typical size, and the proposed waivers are reasonable given the layout of the site.

The Applicant has requested several waivers for this project, these are:

1. **Floor Area Ratio (FAR).** Pursuant to SCCC Section 13.10.323(C) and Table 13.10.323-2, the maximum floor area ratio (FAR) in the RF zone district is 1.5. The project proposes a FAR of about 3.61. The applicant has requested a waiver to allow for the floor area of the building containing six stories and about 91,197 square feet of floor area as proposed.

2. **Building Height and Stories.** Pursuant to County Code Section 13.10.323(C) and Table 13.10.323-2, the maximum building height in the RF zone district is 40 feet. The proposed project includes an overall building height (to top of elevator penthouse) of about 81 feet and 70 feet to top of building roof. The Applicant has requested a waiver to allow for the building containing six stories as proposed.

3. **Setbacks.** A waiver of the setback requirements as required by SCCC Section 13.10.323 and Table 13.10.323-2 is requested. The building is essentially designed to be built to the property lines of the parcel and encroaches into all applicable setbacks.

4. **Vehicle Parking.** A waiver of all County parking standards is requested. The project includes a total of 68 vehicular parking spaces. 22 of the 68 proposed parking spaces are car puzzler (mechanical stacker) spaces and two are ADA spaces. 31 of the 68 proposed parking spaces are designed as compact parking spaces (7.5 feet wide by 16 feet long). The remaining 15 parking spaces are designed as standard parking spaces (8.5 feet wide by 18 feet long). Density Bonus Law prohibits the jurisdiction from imposing a vehicle parking ratio that exceeds one parking space per zero to one bedroom, one and one-half parking spaces for two to three bedrooms, and two and one-half parking spaces for four and more bedrooms. (Gov. Code § 65915(p).) This results in a maximum of 113 parking spaces for the project. Density Bonus Law further permits an Applicant to "request parking incentives

or concessions beyond those provided" as an incentive/concession (Gov. Code § 65915(p)(5)). The project includes both a waiver and concession for all County vehicular parking and design standards. Please see the "Parking" Section of this report below for further discussion of parking.

An Applicant may only "request parking *incentives or concessions* beyond those provided" by Density Bonus Law. (Gov. Code § 65915(p)(5).) Accordingly, a *waiver* may not be granted to reduce the number of parking spaces below what is required by Density Bonus Law, and staff recommends denying this waiver request; however, the waiver for all other County parking standards complies with Density Bonus Law, and must be granted.

5. **Usable Open Space.** Pursuant to SCCC Section 13.10.323(D), common and private open space shall be provided per Table 13.10.323-3 in the RF zone district. Private open space must be directly accessible from the dwelling unit, served at a minimum of 60 square feet per unit for 50% or more of units included in project, with a minimum dimension of 6 feet. The project provides balconies or terraces for private open space for 75 of the 105 proposed dwelling units ranging in size from 38 square feet to 209 square feet; however, at least 50% of the total units (more than 53 of the 105 units) have private open space meeting the minimum 60-square foot minimum area requirement; therefore, the project meets the private usable open space requirement.

   Per Table 13.10.323-3, common open space shall be provided at a quantity of a minimum of 15% of gross site area. For sites larger than ½ acre, common open space shall have a minimum dimension of 20 feet. The amount of common open space required by County Code is 5,094 square feet (15% of 25,471 square feet), and the project provides 3,894 square feet of qualifying common open space provided in a common area terrace on the second story of the building; thus, a waiver is sought from the common open space requirement as the project is deficient in the provision of common open space by about 1,200 square feet overall.

6. **Existing Trees.** SCCC Section 13.11.070(D)(1)(b) requires that existing mature trees are incorporated into the site and landscape design. The project proposes to remove all 39 trees on the property.

7. **Overarching Objective County of Santa Cruz Design Guidelines.** The Santa Cruz County Design Guidelines are used in conjunction with the Santa Cruz County General Plan, County Code, and Design Criteria for streets and frontages. The guidelines provide concepts and best practices for well-designed projects, whereas the General Plan, County Code, and Design Criteria set land use requirements and quantitative development standards that projects are legally required to follow. The Applicant requests waivers from the following OVERARCHING Objective County of Santa Cruz Design Guidelines:

   j. **On-Site Parking** (A4, page 8): Design Guideline: *"Provide on-site parking behind buildings rather than between buildings and street frontages, especially along Main Streets, Multimodal Corridors and Active Connectors."*

      i. **Applicant's Justification:** Parking is provided under the building in the podium. Applies a Density Bonus Law waiver.

k. **Setbacks** (A5, page 9): Design Guideline: *"Provide street-facing setbacks to ensure space for the pedestrian amenity zone, pedestrian sidewalk zone, and activity zone."*

   i. **Applicant's Justification:** Applies a Density Bonus Law waiver to all setbacks.

l. **Upper Floor Stepbacks** (B1, page 10): Design Guideline: *"Stepback - setback of an upper floor of a building from a lower floor.*

   i. **Applicant's Justification:** Stories 2-6 are set back from the podium at the first story, but the building extends into upper story setbacks. Applies a Density Bonus Law waiver to all setbacks.

m. **Parking and Access**. (D3, page 14) Design Guideline: *"Locate parking areas toward rear of the site or otherwise obstruct from off-site views, while maintaining appropriate access for people with disabilities. On Main Streets, discourage parking lots between street frontages and buildings. On Multimodal Corridors, surface parking lots should occupy less than 50% of any single street frontage. See County Design Criteria and Santa Cruz County Code Chapter 13.16 for parking design requirements."*

   i. **Applicant's Justification:** Parking lot does not comply with all objective standards of SCCC 13.16, such as drive aisle width. Applies a Density Bonus Law waiver.

n. **Bike Parking** (D8, page 15): Design Guideline: *"Install shared long and short-term bike parking outside buildings along Multimodal Corridors, Active Connectors and Main Streets, and in interior building locations for on-site residents and workers, if applicable. Provide covered bike parking whenever possible. See SCCC 13.16.040 for bike parking requirements."*

   i. **Applicant's Justification:** Provided Class 2 bicycle parking is spaced two feet apart rather than four feet apart. Applies a Density Bonus Law waiver.

o. **Stepped Massing** (F1, page 20) Design Guideline: *"See SCCC 13.10.323 for residential third-story setbacks and SCCC 13.10.333 for setback requirements for commercial buildings adjacent to residential or agricultural developments Table 13.10.323-2 Minimum of 50% of exterior walls of the third story set back at least 10 feet from property setback lines."*

   i. **Applicant's Justification:** Applies a Density Bonus Law waiver.

p. **Tree Placement** (G4, page 25) Design Guideline: *"Locate trees to increase shade and provide buffers for parking areas, buildings, and the public realm. For security purposes, openings should be incorporated into the landscape design to provide clear views into sites. California Building Code 5.106.12.1 Surface parking areas. For non-residential and mixed-use projects, shade tree plantings, minimum #10*

container size or equal, shall be installed to provide shade over 50% of the parking area within 15 years. California Building Code 5.106.12.2 Landscape areas. For non-residential and mixed-use projects, shade tree plantings, minimum #10 container size or equal, shall be installed to provide shade over 20% of the landscape area within 15 years. Exception: Playfields for organized sport activity are not included in the landscape area calculation. See SCCC 13.11.070(D), SCCC 13.16.060(D) and County Design Criteria for landscape design requirements for sites, streets, and parking areas."

i. **Applicant's Justification:** See landscape plans for proposed tree locations. The criteria is lengthy and complex. If any objective standard is not met, a waiver is requested for the project as proposed. Along the frontage of the project, all trees are proposed in the right-of-way rather than within the property boundaries. The project will comply with State Law California Building Code requirements.

q. **Utility Placement** (I4, page 31) Design Guideline: *"Either contain (within a building) or fully screen all utility cabinets, meters, and backflow prevention devices on Active Connectors and Main Streets to reduce visual impacts. Screening mechanisms can include landscaping, fencing, low walls, or other techniques."*

i. **Applicant's Justification:** Utilities are placed per project requirements. Rooftop mechanical shall be screened. Pad mounted transformers are placed per PG&E requirements. Applies Density Bonus Law waiver.

r. **Residential Unit Pedestrian Access** (D2, page 14): Design Guideline: "*Orient residential buildings so that the majority of ground floor units have individual entries from public streets. This encourages a safe and activated streetscape".*

i. **Applicant's Justification:** None of the residential units on the ground floor front on public streets.

8. **Multifamily Residential Objective County of Santa Cruz Design Guidelines.** The Santa Cruz County Design Guidelines are used in conjunction with the Santa Cruz County General Plan, County Code, and Design Criteria for streets and frontages. The guidelines provide ideas and best practices for well-designed projects, whereas the General Plan, County Code, and Design Criteria set land use requirements and quantitative development standards that projects are legally required to follow. The Applicant requests waivers from the following MULTIFAMILY RESIDENTIAL Objective County of Santa Cruz Design Guidelines:

a. **Building Placement** – Neighborhoods (A1, page 36) Design Guideline: "Within residential neighborhoods, locate multifamily buildings in the center front of the site, especially if other buildings in the neighborhood follow this pattern. Locate front yards along public streets to assist in cultivating a sense of community and neighborhood feel."

i. **Applicant's Justification:** Podium building takes up the entire site. Applies Density Bonus Law waiver.

b. **Building Orientation** (A3, page 36) Design Guideline: "Orient buildings towards public streets with the primary entrance to housing units on the ground floor directly accessible from an adjacent sidewalk. Internally-facing buildings with primary entrances oriented toward a common space should prioritize the pedestrian experience. Primary building facades and entrances should not face parking areas when the option to face the street is available.

    i. **Applicant's Justification:** No ground floor living units proposed. No ability to comply for a podium project. Applies Density Bonus Law waiver.

c. **Building Mass** (B1, page 38) Design Guideline: "Encourage highest building height and mass to be located near the center of the site and building footprint. Building mass should taper from the center of the site toward the property lines to emulate the scale and style of single-family residential development and allow for solar access to open spaces, especially within neighborhoods. Design upper floor mass to complement neighborhood scale by incorporating design elements such as upper floor stepbacks and gable and hip roof forms. See SCCC 13.10.323(C) for third floor stepback requirements."

    i. **Applicant's Justification**: Building mass steps back with slope of site with tallest portion of the building facing the street and shorter sides facing neighboring properties.

d. **Building Stepbacks** (B5, page 40) Design Guideline: "Upper floor building mass should be stepped back along internal frontages to provide solar access to common open spaces, internal drives, and other on-site spaces. Upper-floor stepbacks along frontages should be incorporated along Local Residential Streets. See SCCC 13.10.323(C) for third floor stepback requirements."

    i. **Applicant's Justification:** The project applies a Density Bonus Law waiver to third story and upper stories stepback requirements.

e. **Private Open Space** (C1, page 43) Design Guideline: "On sites zoned Residential Multifamily (RM), provide 60 square feet of private open space for every unit. Site buildings to accommodate stoops and porches along ground floor unit entrances, including internal-facing front yards. On sites zoned Residential Flex (RF), higher density development may not allow for private open space for every unit. Wherever private open space is provided for multifamily projects, the minimum dimension should be six feet in order to ensure that the space is usable"

    i. **Applicant's Justification:** No ground floor living units proposed. No ability to comply for a podium project.

f. **Common Open Space** (C2 page 43) Design Guideline: "On sites zoned RM, provide 200 square feet of common open space per unit. On sites zoned RF, provide at least 15% of gross site area as private or common open space. Locate common open space areas in front and side yard areas when possible. On larger sites with

multiple structures or along Multimodal Corridors, explore centrally-located common open spaces, such as plazas, that are interconnected with a network of pedestrian paths to individual private open spaces. Wherever common open space is provided, the minimum dimension should be 15-20 feet to ensure that the space is usable. See SCCC 13.10.323(D) for usable open space requirements.

i. **Applicant's Justification:** "RF zoning applies per Builder's Remedy. Common open space square footage requirements not met. Applies Density Bonus Law waiver.

Conditions of Approval

Exhibit D: Project plans, prepared by Workbench, dated May 15, 2025.

I. This permit authorizes the construction of a multifamily building as indicated on the approved Exhibit "D" for this permit. This approval does not confer legal status on any existing structure(s) or existing use(s) on the subject property that are not specifically authorized by this permit. Prior to exercising any rights granted by this permit including, without limitation, any construction or site disturbance, the applicant/owner shall:

A. Sign, date, and return to Santa Cruz County Planning one copy of the approval to indicate acceptance and agreement with the conditions thereof.

B. Obtain a Building Permit from the Santa Cruz County Building Official.

1. Any outstanding balance due to Santa Cruz County Planning must be paid prior to making a Building Permit application. Applications for Building Permits will not be accepted or processed while there is an outstanding balance due.

C. Obtain a Grading Permit from the Santa Cruz County Building Official.

D. Obtain an Encroachment Permit from the Department of Public Works for all off-site work performed in the County road right-of-way.

E. In conformance with Public Resources Code Section 21080.66, complete and provide a phase I environmental assessment, as defined in Section 78090 of the Health and Safety Code.

F. To ensure conformance with the Federal Aviation Administration (FAA) regulations, the FAA shall be notified in advance of any construction or alteration of the approved project as required by the Federal Aviation Regulations, including filing of the FAA Form 7460-1 in accordance with all its requirements. FAA Form 7460-1 shall be included with all Building Permit Applications for construction or alteration of the building.

II. Prior to issuance of a Building Permit the applicant/owner shall:

A. Fees shall be paid prior to obtaining a building permit, however, if fees are deferred pursuant to Government Code Section 66007(d)(3), property owner shall enter into a fee deferral agreement with the County, which shall be recorded.

B. Submit final architectural plans for review and approval by Santa Cruz County Planning. The final plans shall be in substantial compliance with the plans marked Exhibit "D" on file with Santa Cruz County Planning. Any changes from the approved Exhibit "D" for this development permit on the plans submitted for the Building Permit must be clearly called out and labeled by standard architectural methods to indicate such changes. Any changes that are not properly called out and

labeled will not be authorized by any Building Permit that is issued for the proposed development. The final plans shall include the following additional information:

1. A copy of the text of these conditions of approval incorporated into the full size sheets of the architectural plan set.

2. One elevation shall indicate materials and colors as they were approved by this Discretionary Application. If specific materials and colors have not been approved with this Discretionary Application, in addition to showing the materials and colors on the elevation, the applicant shall supply a color and material sheet in 8 1/2" x 11" format for Santa Cruz County Planning review and approval.

3. Grading, drainage, and erosion control plans.

4. The building plans must include a roof plan and a surveyed contour map of the ground surface, superimposed and extended to allow height measurement of all features. Spot elevations shall be provided at points on the structure that have the greatest difference between ground surface and the highest portion of the structure above. This requirement is in addition to the standard requirement of detailed elevations and cross-sections and the topography of the project site which clearly depict the total height of the proposed structure. Maximum number of stories is six stories.

5. Details showing compliance with fire department requirements.

6. Details showing compliance with Accessibility (ADA) requirements.

7. Final plans shall include a lighting plan meeting the following standards:

    a. All site, building, security, and landscape lighting shall be directed onto the site and away from adjacent properties, so as not to cause annoying glare or illumination. Light sources shall not be visible from adjacent properties. Light sources can be shielded by landscaping, structure, fixture design or other physical means. Building and security lighting shall be integrated into the building design.

    b. All lighted parking and circulation areas shall utilize low-rise light standards or light fixtures attached to the building. Light standards shall not exceed a maximum height of 15 feet.

    c. Area lighting shall be consistent with California Green Building Standards Code and California Energy Code for outdoor lighting requirements

C. Meet all requirements of the County Department of Public Works, Stormwater Management. Drainage fees will be assessed on the net increase in impervious area. The rate on April 22, 2024, was $1.57 per square foot. At a minimum, with regards to Stormwater Management review, the following items shall be included with the building permit application:

1. Final Civil Improvement Plans that address all items in the CDC Part 3 Appendix D and:

   a. Plans shall include a legend and details for all proposed surfacing.

   b. Plans shall show how runoff from all proposed impervious areas will be routed consistent with the final mitigation sizing and analysis. Show how all roof runoff will be routed to the surface of the SCMs. How will the stairways and concrete area near the NW corner be routed to the SCM for DMA-1b Show how runoff from the trench drains will be routed to the SCMs.

   c. Provide a detail for the depressed landscape strip behind the sidewalk on Paul Sweet Road. Maintenance of this biofiltration area shall be covered in the SWM-25B for the project.

   d. Update the plans to show how and where retaining wall backdrains will be routed. They should not be routed to SCMs or hard piped to the County road or storm drain system.

   e. Provide final details, materials, specifications and methods of construction. The design and materials shall be consistent with the CDC Part 3 Section J – Storm Drain Facilities.

   f. Update biofiltration detail to include a requirement for surface infiltration testing. Specify the test method and acceptable rate to be demonstrated prior to permit final.

   g. Provide a legend for all of the abbreviations used for the biofiltration facility callouts. Show these callouts on the detail C3.1. Provide minimum dimensions for each biofiltration/detention planter.

   h. Provide plans to include the upgrades, repair, replacement of the downstream private storm drain system as needed based on the engineer's assessment of the capacity and condition.

   i. Add a note to include signage at each inlet/catch basin stating "No Dumping Drains to Bay" or equivalent.

   j. Part 3 Section D.3.c: Update the plans to include all feasible Site Design and Runoff Reduction Requirements.

2. Final Stormwater Management Report: Please provide an updated report that addresses the requirements in the CDC Part 3 Appendix D and the following:

   a. Due to known downstream constraints in the Arana Gulch watershed the flood control mitigation shall be sized to store the post development 25 year volume while releasing at the predevelopment 10 year rate as a minimum (if the assessment of the downstream private system shows further restrictions, mitigation sizing may need to be adjusted). While the report acknowledges this requirement, the preliminary analysis in Appendix E was based on post development 10 year volume. See CDC Part 3 Sections D.3.a.i and G.3.d.a. Provide analysis demonstrating the proposed systems provide adequate storage below the biofiltration cross section.

   b. Update the report to include a downstream evaluation for the private portion of the storm drain system through the Santa Cruz Cemetery property from Paul Sweet Road to Arana Gulch for both capacity and condition. The master plan provided in the preliminary report did not evaluate the system through private property. See CDC Part 3 Section D.3. The applicant has opted, at their own risk, to delay providing this assessment until the building permit application stage. If the assessment results in requirements for additional offsite work (upgrades, repairs, replacements, etc.) this may necessitate an additional discretionary application.

   c. Provide geotechnical review and evaluation of the feasibility of open bottom biofiltration facilities with an underdrain, but without liners/barriers consistent with CDC requirements. Update plans as necessary to be consistent with these requirements as feasible.

   d. Update the report to address the feasibility of the Site Design and Runoff Reduction Measure requirements from the CDC.

3. Maintenance: A recorded stormwater management maintenance that establishes responsibility for the operation and maintenance of the stormwater facilities, source control measures, mitigation features, storm drain markings/signage, drainage patterns, and impervious area limits established with the project and which is consistent with and includes all required attachments (site plan and checklist) as specified in Part 3 Section D.3.d of CDC is required. The agreement shall identify the entity responsible for submitting the annual maintenance report and paying associated annual fees. The agreement shall include annual infiltration testing of each biofiltration surface, photos of each cleaned and intact flow control orifice as well as checklists for each stormwater mitigation and feature. An acceptable draft agreement shall be provided prior to building permit issuance. The recorded agreement shall be provided prior to building permit final – a hold will be placed on the permit for the recorded

agreement.

4. Impervious area impact fees. Since the project is located in Santa Cruz County Flood Control and Water Conservation District Zones 5 impact fees based on the net increase in permitted impervious area will be assessed following the Unified Fee Schedule. The project may be eligible for fee credits for existing impervious areas previously permitted or built prior to the establishment of the flood control zone. To establish credit eligibility, documentation should be submitted with the project plans. Documentation such as assessor's records, survey records, permit records, dated aerial photographs or other official records that will help establish and determine the construction date, structure/impervious area footprint, or to confirm that a permit was previously issued is acceptable. Zones 5 was established in 1969.

5. Public Works staff will inspect the construction of the drainage related items. Please provide an engineer's estimate for the construction of the drainage items (there is a 3% deposit for an at-cost inspection fee). A hold will be placed on the building permit for a preconstruction meeting with the Public Works Construction Inspector (please email at least 48 hours prior to construction to schedule the preconstruction meeting at DPWCMInspection@santacruzcountyca.gov). A second hold will be made for approval of the final construction by the Public Works Construction Inspector.

6. The project civil engineer is required to provide as-built civil improvement plans. The plans shall be signed and dated and all as-built changes relative to the approved plans shall be clouded.

D. Meet all requirements of the City of Santa Cruz Water Department. Proof of water service availability is required prior to application for a Building Permit.

E. Meet all requirements of the Santa Cruz County Sanitation District. Proof of sanitary sewer service availability is required prior to application for a Building Permit. At a minimum, with regards to Sanitation District review, the following items shall be included with the building permit application:

1. Applicant shall work with the Sanitation District to confirm the public sewer main has been properly vacated.

2. Provide evidence of private utility easement for private service line on neighbor's property.

3. Include profiles of private sewer lines.

4. Include Santa Cruz County Design Criteria

5. Sewer connection fees shall be calculated per the most recently approved

District Code/Resolution at the time of building permit application.

6. Include demolition notes on the plans that a sewer lateral abandonment permit must be acquired from the Sanitation District and completed prior to demolition of the structures.

7. Design and Construction Standards: The project sewer design and connection of the project to the Santa Cruz County Sanitation District system will be required to conform to the County of Santa Cruz Design Criteria (CDC) Part 4, Sanitary Sewer Design, latest edition. http://www.dpw.co.santa-cruz.ca.us/Portals/19/pdfs/DESIGNCRITERIA.pdf

F. Meet all requirements of the Environmental Planning section of Santa Cruz County Planning. The following items shall be included with the building permit application.

1. A copy of the biotic approval letter dated October 15, 2025, including all attachments, shall be submitted with any future permit applications.

2. To reduce potential impacts to sensitive habitats and special-status species that may result from artificial light, the following shall be adhered to:

   a. The project shall avoid the installation of any non-essential artificial lighting.

   b. All essential outdoor lighting shall be limited through the use of timers and/or motion sensors.

   c. All essential outdoor lighting shall be shielded, cast downward, and directed such that it does not shine off the property into surrounding areas, other parcels, or the night sky.

3. Existing mature oak trees on the property and adjacent properties shall be incorporated into the project design to the maximum extent feasible. Trees to be retained shall be protected at or outside of the dripline. If work must occur within the dripline of retained trees, impacts shall be evaluated by a certified arborist and protective measures, as recommended by the arborist, shall be included in the project plans.

4. To comply with Santa Cruz County General Plan Policy ARC-3.1.6 and Santa Cruz County Code Sections 16.32.090 (B)(1), to compensate for permanent impacts to sensitive oak woodland habitat, oak trees removed or otherwise permanently impacted as a result of the project shall be compensated for through in-kind replacement plantings at a 3:1 ratio through one of the options listed below.

a. Replacement plantings: Native trees removed for this project shall be compensated for through replacement plantings in kind either onsite or at an approved offsite location at a 3:1 ratio. This option requires: a planting plan with the species, size, and locations of all replacement plantings, information regarding the methods of irrigation for all replacement plantings, a 5-year plan for maintenance and monitoring of replacement plantings.

b. Payment to County in-leu fee program: Native trees removed for this project shall be compensated for through payment into a County approved in-leu fee program for tree removal compensation at a 3:1 ratio if/when such a program is available. This option must be considered only as a last resort and must be approved by the Environmental Coordinator. Alternative options considered and determined infeasible must be discussed in the Habitat Mitigation Plan.

c. Offsite habitat preservation: Native trees removed for this project shall be compensated for through preservation of habitat at an offsite location approved in collaboration with the County Environmental Coordinator which includes protection in perpetuity of trees in an amount equivalent to or greater than a 3:1 ratio. This option requires: a habitat evaluation and/or arborist report of the property to be preserved with the species, size, and locations of trees intended to compensate for tree removals at a 3:1 ratio, and a conservation easement or equivalent intended to protect the property as "protected habitat" from habitat disturbance in perpetuity.

d. For any off-site locations, written property owner approval for a deed restricted habitat protection site must be provided. An agreement for ongoing access to monitor and maintain the plantings for the required monitoring period must also be included.

5. A Habitat Mitigation Plan prepared by a qualified biologist or restoration specialist must be submitted with the building permit application for review and approval by Environmental Planning Staff. The plan should be focused on identifying and outlining the strategy for complying with Condition II.F.4 above and must include the following minimum elements:

a. A table with the final post-construction permanent and temporary impact calculations, area of oak woodland permanently removed as part of the project, and final quantity of oak trees removed or otherwise permanently impacted as a result of the project.

b. A map of all designated restoration areas on site or at an off-site location required for replacement oak tree plantings including a map of all designated restoration areas on that site and a planting plan with species, size, and locations of all restoration plantings

including replacement oak trees required under Condition II.F.4 above.

c. Property owner approval for a deed restricted habitat protection site must be provided for any off-site locations. An agreement for ongoing access to monitor and maintain the plantings for the required monitoring period must also be included.

d. Information regarding the methods of irrigation for restoration plantings.

e. A 5-year Management Plan for maintenance and monitoring of restored areas, including a proposed mechanism for evaluating success.

f. The establishment and planting of all areas as outlined in this Plan must be completed prior to final inspection of the project.

g. Design Conditions. The final plans shall include a plan sheet showing the development footprint delineated with a thick bold line. The development footprint (total project impact area) encompasses the building envelope (permanent impact area; structures and paving) and all temporary disturbance associated with a project including grading, installation of utilities, access routes, deposition of refuse or debris and areas needed for creation and management of defensible space. The development footprint shall mark the limits of work within which all temporary and permanent disturbance associated with the project may occur. This plan sheet shall also include the following: (1) All trees proposed for removal shall be shown on the plans and all oak trees shall be labeled as 'oak'. (2) Native trees to be retained near or within the project impact area shall be identified on the plans and labeled for protection. (3) Tree protection specifications and measures provided by a certified arborist to reduce impacts to retained trees shall be listed. (4) A table with the final post-construction permanent and temporary impact calculations, area of oak woodland permanently removed as part of the project, and final quantity of oak trees removed or otherwise permanently impacted as a result of the project. (5) Everything outside of the development footprint shall be marked on the plans for avoidance during construction and fenced or flagged as outlined in the construction conditions below.

G. Meet all requirements and pay any applicable plan check fee of the Central Fire Protection District.

H. Submit 3 copies of plan review letters prepared and stamped by the project Geotechnical Engineer.

I. Pay the fees for Parks mitigation. On April 22, 2024, these fees were $3.38 per square foot for multifamily dwellings. Deed restricted lower-income affordable units in the project are exempt from this fee pursuant to the Parks fee enabling ordinance.

J. Pay the current fees Child Care mitigation. On April 22, 2024, these fees were $0.28 per square foot for multifamily dwellings. Deed restricted lower-income affordable units in the project are exempt from this fee pursuant to the Child Care fee enabling ordinance.

K. Meet all requirements of the Roadway Engineering Section of the Public Works Division. Including the following:

1. Pay the fees for Roadside and Transportation improvements. On April 22, 2024, these fees were, respectively, $2,100 and $2,100 per unit.

2. The project shall provide half-width improvements consisting of the following:
   a. One 11-foot-wide vehicular Travel Lane
   b. One 6-foot-wide Bike Lane (not required to stripe, however flowline shall be set to accommodate it)
   c. 6.625-foot-wide Curb and Sidewalk (0.625-foot-wide Curb and 6-foot-wide Sidewalk)
   d. One 4-foot-wide Landscape Strip.
   e. Where the existing right-of-way is not adequate to accommodate the standards listed above, the width of the landscape strip can be reduced as necessary to accommodate.

3. The civil plans submitted for the building permit shall address the following:
   a. Landscape strip at the back of sidewalk shall be graded to 2-percent maximum for 4 feet-width and then 2:1 maximum for any remainder
   b. Provide plan and profile sheets, profiles shall include existing and proposed flowline and centerline
   c. Provide cross sections every 50 feet along Paul Sweet Road along the project frontage
   d. Provide stationing along Paul Sweet Road
   e. Any proposed backflow preventers shall be installed on-site, no portion of it shall encroach within the existing right-of-way

L. Project shall provide at least six (6) units in the project deed-restricted affordable to Extremely Low-Income households (those at or below 30% AMI, as further defined by State Law and as published annually in the HCD State Income Limits table), for a term of at least 55 years.

M. All affordable units in the project shall comply with Government Code Section 65598.5(f)(6)(G)(ii): "Affordable units in the development project shall have a comparable bedroom and bathroom count as the market rate units".

N. The project shall comply with all applicable requirements of Government Code Sections 65915 through 65918 (State Density Bonus Law), including recording a deed restriction sufficient for the County to ensure, pursuant to Government Code Section 65915(c)(1), the continued affordability of all very low and low-income rental units (including ELI units) that qualified the applicant for the award of the density bonus for 55 years or a longer period of time if required by the construction or mortgage financing assistance program, mortgage insurance program, or rental subsidy program.

O. The project shall comply with all applicable requirements of Government Code Section 65589.5 (Housing Accountability Act), including recording a deed restriction sufficient for the County to ensure, pursuant to Government Code Section 65589.5(h)(3)(D), the continued affordability of all extremely low income rental units that qualified the housing development as a builder's remedy project as defined at Government Code Section 65589.5(h)(11), and as housing for mixed-income households as defined at Government Code Section 65589.5(h)(3)(C).

P. The project shall comply with Health and Safety Code Section 17929, which requires that the occupants of the affordable units have the same access to common entrances, common areas, and amenities as the market-rate housing units; and that the affordable units not be isolated to a specific floor, or area of a specific floor. The project shall comply with all other applicable provisions of State and Federal law, including fair housing laws.

Q. Pay the Affordable Housing Impact Fee for all market-rate units. The fees are based on unit floor area. The fee rate on April 22, 2024, was $2 per habitable square foot of the market-rate rental units.

R. Provided parking must be located entirely outside all public rights-of-way. Parking must be clearly designated on the plot plan.

S. Submit a written statement signed by an authorized representative of the school district in which the project is located confirming payment in full of all applicable developer fees and other requirements lawfully imposed by the school district.

T. Any application for conversion of non-living space within the multifamily structure to ADUs shall not be considered until certificate of occupancy is issued for the building.

III. All construction shall be performed according to the approved plans for the Building Permit. Prior to final building inspection, the applicant/owner must meet the following conditions:

A. All site improvements shown on the final approved Building Permit plans shall be

installed.

B. All inspections required by the building permit shall be completed to the satisfaction of the County Building Official.

C. The project must comply with all recommendations of the approved soils reports.

D. To minimize noise, dust and nuisance impacts to surrounding properties during construction, the owner/applicant shall or shall have the project contractor, comply with the following measures during all construction work:

1. Limit all construction to the time between 8:00 am and 5:00 pm weekdays unless the Building Official has in advance authorized a temporary exception to this time restriction to construction activities to occur outside of those hours; and

2. Perform dust reduction measures consistent with the Monterey Bay Area Air Resources District's basic control measures

3. The Applicant shall designate a disturbance coordinator and a 24-hour contact number shall be conspicuously posted on the job site. The disturbance coordinator shall record the name, phone number, and nature of all complaints received regarding the construction site. The disturbance coordinator shall investigate complaints and take remedial action, if necessary, within 24 hours of receipt of the complaint or inquiry.

E. Construction shall adhere to the conditions provided in the conditioned Biotic Review and Conditioned Biotic Approval letter dated October 15, 2025, and included below for reference:

1. Trees to be retained on site or on adjacent parcels shall be protected with high visibility fencing as recommended by a certified arborist and avoided during construction. All additional protection measures provided by the arborist shall be adhered to.

2. To avoid impacts to protected wildlife:

a. Tree removal and building demolition shall occur during the period of September 1st through January 31st if feasible in order to avoid the bird and bat nesting season and after bumblebee colonies have senesced on their own. If building demolition and removal of vegetation begins outside of the February 1 to August 31 breeding season, there will be no need to conduct a preconstruction survey for bumblebees or active bird nests.

b. If building demolition and removal of vegetation is to commence between February 1st and August 31st the following shall be adhered to:

i. Within two weeks prior to commencement of building demolition of removal of trees, a survey for active bird nests shall be conducted by a qualified biologist. The survey area shall include the project area, and a survey radius around the project area of 50 feet for MBTA birds and 250 feet for birds of prey.

ii. If no active nest of a bird of prey or MBTA bird is found, then no further avoidance and minimization measures are necessary.

iii. If active nest(s) of MBTA birds or birds of prey are found in the survey area, an avoidance buffer intended to prevent project-related nest abandonment shall be established around the active nest(s). The size of the buffer shall be determined by the biologist as appropriate to the species and types of work activities being completed. The biologist shall monitor the nest to ensure that nesting behavior is not negatively impacted and will advise the applicant when all young have fledged the nest. The project biologist shall have the authority to increase the buffer distance based on monitoring results if necessary to provide adequate protection for nesting birds. Removal of vegetation, grading activity, or other use of heavy equipment may begin after fledging is complete.

iv. If removal of vegetation, grading activity, or other use of heavy equipment stops for more than two weeks during the nesting season (February 1st - August 31st) a new survey shall be conducted prior to re-commencement of construction.

v. A survey to confirm presence/absence of bumblebee activity shall be conducted by a qualified biologist within two weeks prior to building demolition or removal of trees. If bumblebee activity indicating a potential nest site is observed, development activity that would disturb the nest, may not occur until bumblebee activity has ceased. Once bumblebee activity (bees entering and exiting the location) has ceased, development activity may proceed.

c. To avoid impacts to bats: Within two weeks prior to building demolition or removal of trees, a focused survey for bats shall be conducted by a qualified biologist. If no bats are occupying the outbuildings or tree cavities, then demolition or removal of trees may proceed. If bats are observed using the outbuildings or tree cavities, then the biologist, in coordination with CDFW, will recommend methods to either allow bats to leave the outbuildings and trees and not return (exclusion devices), or other methods specific to this demolition project to avoid harm to individual bats.

Trees without cavities may have foliage roosting bats occasionally. To avoid harm to individual bats, trees shall be cut down and allowed to lie on the ground for 24 hours prior to chipping, to allow any foliage roosting bats to leave on their own.

d. To avoid impacts to San Francisco dusky-footed Woodrats: Within two weeks prior to commencement of construction, a qualified biologist shall perform a pre-construction survey for woodrat houses within the work area boundaries and a 25-foot buffer around the proposed work. Flag and establish buffers around each woodrat house observed. The buffer width will be determined by the qualified biologist, but will not be less than 5 feet. If a woodrat house is present and impacts cannot be avoided, then a qualified biologist shall contact CDFW for approval to implement a woodrat relocation plan. This could involve live trapping and the construction of alternate houses in adjacent suitable habitat. The woodrat relocation plan must be implemented by a qualified biologist possessing a Scientific Collection Permit authorizing the handling of woodrats. Authorization by CDFW must be obtained prior to the implementation of this measure. Post-relocation monitoring may be required by CDFW, as part of the plan.

3. A brief memo summarizing the results of the preconstruction surveys outlined above shall be submitted to the Environmental Coordinator for review prior to the start of construction.

F. Pursuant to Sections 16.40.040 and 16.42.080 of the County Code, if at any time during site preparation, excavation, or other ground disturbance associated with this development, any artifact or other evidence of an historic archaeological resource or a Native American cultural site is discovered, the responsible persons shall immediately cease and desist from all further site excavation and notify the Sheriff-Coroner if the discovery contains human remains, or the Planning Director if the discovery contains no human remains. The procedures established in Sections 16.40.040 and 16.42.080, shall be observed.

G. Provisions to address discovery of a tribal cultural resource during construction:

1. Tribal Cultural Resources Sensitivity Training. The project sponsor, in consultation with any Cultural Resources Team if one is available, shall retain the services of an Ohlone Native American representative and/or archeological consultant from the Qualified List of Archaeological Consultants to provide cultural sensitivity and archeological awareness training to all work crews who will be involved in ground disturbing activities at the project site. The training shall inform all project contractors, subcontractors and work crew members to be on the alert for evidence of the presence of potential tribal cultural resource(s), of how to identify the evidence of such a resource(s), and of stop work, resource protection, and

notification requirements in the event of suspected discovery of a tribal cultural resource by construction crew members.

2. Stop Work and Notification Upon Discovery. Should any indication of a tribal cultural resource be encountered during any soils-disturbing activity of the project, the project Head Foreperson and/or project sponsor shall immediately notify tribe and shall immediately suspend any soils-disturbing activities in the vicinity of the discovery until the Cultural Monitor and a qualified archeological consultant from the Qualified Archeological Consultants List have assessed the find and the respective parties have determined whether and what additional measures should be undertaken.

3. Preservation in Place. In the event of the discovery of a tribal cultural resource, the cultural resource team (if one is present on job), the project sponsor, the archeological consultant, and the Ohlone representative shall consult to determine whether preservation in place would be feasible and effective in preserving the values represented by the resource. The archeological consultant, in consultation with the Ohlone representative, shall document the find to current professional standards. The tribe may also require that the project sponsor immediately implement a site security program if the resource is at risk from vandalism, looting, or other damaging actions.

   a. If it is determined that preservation-in-place of the tribal cultural resource would be both feasible and effective, the archeological consultant shall prepare a Resource Preservation Plan (RPP) in consultation with the Ohlone representative, for review, which shall be implemented by the project sponsor during construction.

   b. If it is determined that preservation in place would not be feasible or effective, then archeological assessment and treatment shall be implemented and in consultation with the Ohlone representative, as detailed below.

4. Archeological Treatment. If it is determined, in consultation with the Ohlone representative and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option to preserve the values represented by the resource, then the archeological consultant, in consultation with the Ohlone representative, shall conduct archeological assessment to determine the significance of the find and determine whether it retains sufficient integrity to warrant additional treatment. If the tribal cultural resource is determined to be a significant archeological resource, the archeological consultant, in consultation with the Ohlone representative, shall recommend appropriate archeological treatment to preserve the data and values of the tribal cultural resource, which may include archeological data recovery. Data recovery shall be implemented in consultation with the Ohlone representative and shall include appropriate analyses and reporting. If an archeological

interpretive, monitoring, and/or testing program is required, it shall be consistent with Standard guidelines for such programs and shall be implemented immediately.

5. Human Remains and Funerary Objects. The treatment of any human remains, and funerary objects discovered during any soils disturbing activity shall comply with applicable State laws, including Section 7050.5 of the Health and Safety Code and Public Resources Code Section 5097.98. If human remains or suspected human remains are encountered during construction, the contractor and project sponsor shall ensure that ground-disturbing work within 50 feet of the remains is halted immediately and shall arrange for the protection in place of the remains until appropriate treatment and disposition have been agreed upon and implemented in accordance with this section. The project sponsor shall immediately notify the Medical Examiner of the County in which the job resides and the Tribe of the find. In the event of the Medical Examiner's determination that the human remains are Native American in origin, the Medical Examiner will notify the California State Native American Heritage Commission (NAHC) within 24 hours and all provisions of Public Resources Code Section 5097.98 will be followed.

6. Interpretive Program. If it is determined, in consultation with Ohlone representative and the project sponsor, determines that preservation-in-place of the tribal cultural resource is not a sufficient or feasible option, the project sponsor, in consultation with local Native American representatives, shall prepare a Cultural Resources Public Interpretation Plan (CRPIP) to guide the interpretive program. The CRPIP shall be submitted for review and approval prior to implementation of the program. The interpretive program may but is not limited to artist installations, preferably by local Native American artists, oral histories with local Native Americans, cultural displays, educational panels, or other interpretive elements agreed upon by the sponsor, and Ohlone Native American representatives, and shall include an on-site acknowledgement that the project is built on traditional Ohlone land. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. Upon approval of the CRPIP and prior to project occupancy, the interpretive program shall be implemented by the project sponsor. The project sponsor shall work with the tribal representative to identify the scope of work by the tribal representative to fulfill the requirements of this mitigation measure, which may include participation in preparation and review of deliverables (e.g., plans, interpretive materials, artwork). Tribal representatives shall be compensated for their work as identified in the agreed upon scope of work.

IV. Operational Conditions

A. In the event that future County inspections of the subject property disclose

noncompliance with any Conditions of this approval or any violation of the County Code, the owner shall pay to the County the full cost of such County inspections, including any follow-up inspections and/or necessary enforcement actions, up to and including permit revocation.

V. Indemnification

The applicant/owner shall indemnify, defend with counsel approved by the COUNTY, and hold harmless the COUNTY, its officers, employees, and agents from and against any claim (including reasonable attorney's fees, expert fees, and all other costs and fees of litigation), against the COUNTY, its officers, employees, and agents arising out of or in connection to this development approval or any subsequent amendment of this development approval which is requested by the applicant/owner, regardless of the COUNTY's passive negligence, but excepting such loss or damage which is caused by the sole active negligence or willful misconduct of the COUNTY. Should the COUNTY in its sole discretion find the applicant's/owner's legal counsel unacceptable, then the applicant/owner shall reimburse the COUNTY its costs of defense, including without limitation reasonable attorney's fees, expert fees, and all other costs and fees of litigation. The applicant/owner shall promptly pay any final judgment rendered against the COUNTY (and its officers, employees, and agents) covered by this indemnity obligation. It is expressly understood and agreed that the foregoing provisions are intended to be as broad and inclusive as is permitted by the law of the State of California and will survive termination of this development approval.

A. The COUNTY shall promptly notify the applicant/owner of any claim, action, or proceeding against which the COUNTY seeks to be defended, indemnified, or held harmless. The COUNTY shall cooperate fully in such defense.

B. Nothing contained herein shall prohibit the COUNTY from participating in the defense of any claim, action, or proceeding if both of the following occur:

1. COUNTY bears its own attorney's fees and costs; and

2. COUNTY defends the action in good faith.

C. Settlement. The applicant/owner shall not be required to pay or perform any settlement unless such applicant/owner has approved the settlement. When representing the COUNTY, the applicant/owner shall not enter into any stipulation or settlement modifying or affecting the interpretation or validity of any of the terms or conditions of the development approval without the prior written consent of the COUNTY.

D. Successors Bound. The "applicant/owner" shall include the applicant and/or the owner and the successor'(s) in interest, transferee(s), and assign(s) of the applicant and/or the owner.

Director at the request of the applicant or staff in accordance with Chapter 18.10 of the County Code.

Please note: This permit expires three years from the effective date listed below unless a building permit (or permits) is obtained for the primary structure described in the development permit (does not include demolition, temporary power pole or other site preparation permits, or accessory structures unless these are the primary subject of the development permit). Failure to exercise the building permit and to complete all of the construction under the building permit, resulting in the expiration of the building permit, will void the development permit, unless there are special circumstances as determined by the Planning Director.

Approval Date: _____

Effective Date: _____

Expiration Date: _____

Appeals: Any property owner, or other person aggrieved, or any other person whose interests are adversely affected by any act or determination of the Planning Commission, may appeal the act or determination to the Board of Supervisors in accordance with chapter 18.10 of the Santa Cruz County Code.

3500 PAUL SWEET ROAD

PLANNING REVISION

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AP3.01	PROPOSED ELEVATIONS
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LANDSCAPE	
L1.1	LANDSCAPE PLAN
L1.2	LANDSCAPE PLAN LEVEL 2

PROJECT DIRECTORY

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IFLAND ENGINEERING
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REGENCY LIGHTING
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SCOPE OF WORK

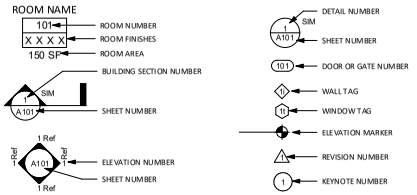
THE PROJECT WILL BE A MULTIFAMILY RESIDENTIAL BUILDING OVER PARKING AND PODIUM. THE SIX STORY BUILDING USES STATE DENSITY BONUS LAW AND IS SUBJECT TO BUILDERS REMEDY. THE PROJECT WILL BE A PRIVATELY FUNDED PROJECT.

THE RESIDENTIAL LOBBY IS ACCESSED FROM PAUL SWEET RD. AND IS ELEVATED FROM THE STREET. THE RESIDENTIAL LOBBY PROVIDES ACCESS TO SECURED RESIDENT STORAGE AND A MAIL/PACKAGE ROOM. THE SECOND FLOOR TERRACE PROVIDES OUTDOOR SPACE FOR RESIDENT-ONLY USES.

THE UNITS WILL BE A MIX OF STUDIO, JR. 1 BEDROOM, 1 BEDROOM, AND 2 BEDROOM UNITS. RESIDENT STORAGE WILL ALSO BE PROVIDED. THE SECOND FLOOR TERRACE WILL PROVIDE GROUP OPEN SPACE IN THE FORM OF GARDENS AND OUTDOOR LOUNGE AREA. SOLAR PV AND MECHANICAL EQUIPMENT WILL ALSO BE INCLUDED AT THE UPPER ROOF LEVEL.

THE EXISTING SITE CURRENTLY INCLUDES A DILAPIDATED SINGLE FAMILY RESIDENCE, A STORAGE SPACE, AND A SHED. ALL EXISTING STRUCTURES AND SITE ELEMENTS ARE IN A STATE OF ADVANCED DISREPAIR AND WILL BE DEMOLISHED AS A PART OF THIS PROJECT.

GRAPHIC LEGEND



workbench
189 WALNUT AVENUE
SANTA CRUZ, CA 95060
WORKBENCHBUILT.COM
P: 831.227.2217

Exhibit D

3500 PAUL SWEET ROAD

3500 PAUL SWEET ROAD
SANTA CRUZ, CA 95065

LICENSED ARCHITECT JAY PEREZ STATE OF CALIFORNIA
NOT FOR CONSTRUCTION
NOT FOR CONSTRUCTION

ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
0	DRG SUBMITTAL	01.20.24
1	SB330	03.19.24
2	SB330 - 6 STORY	04.18.24
3	PLANNING SUBMITTAL	06.06.24
4	PLANNING SUBMITTAL	09.16.24
6	PLANNING REVISION	03.04.25
7	PLANNING REVISION	05.15.25

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	JP
Checked by	EB
Scale	NTS

All drawings and written material appearing herein constitute original and unpublished work of Workbench, Inc. and may not be duplicated, used or disclosed without written consent of the Workbench, Inc.

COVER AND SHEET INDEX

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STATE HOUSING LAW INFORMATION

3500 Paul Sweet - Application # 241360 | 3500 Paul Sweet Rd, Santa Cruz, CA 95065

STATEMENT OF APPLICATION

This is an application for a housing development permit, as defined in Gov. Code § 65905.5(b)(3), and the application must be reviewed pursuant to the Permit Streamlining Act (Gov. Code § 65920 et. seq.).

Per Gov. Code § 65943(a), "Not later than 30 calendar days after any public agency has received an application for a development project, the agency shall determine in writing whether the application is complete and shall immediately transmit the determination to the applicant for the development project. ... If the written determination is not made within 30 days after receipt of the application, and the application includes a statement that it is an application for a development permit, the application shall be deemed complete for purposes of this chapter..."

In accordance with Gov. Code § 65945, Applicant hererby requests to receive notice from the city or county of a proposal to adopt or amend any of the following plans or ordinances: a general plan (or any element thereof; and including any local coastal program, area plan, community plan, or airport land use compatibility plan), a specific plan, a zoning ordinance, an ordinance affecting building permits or grading permits, or any other ordinance which may affect the Project or the Project site.

SB 330 PRELIMINARY APPLICATION

Applicant provided an "SB 330 preliminary application" including all of the information required for a preliminary application in accordance with Gov. Code § 65941.1. Having provided this preliminary application containing all of the required information, the preliminary application is deemed complete pursuant to Gov. Code § 65941.1(a).

The number of residential units (as per Gov. Code § 65589.5(o)(2)(E), "... exclusive of any increase resulting from the receipt of a density bonus, incentive, concession, waiver, or similar provision, including any other locally authorized program that offers additional density or other development bonuses when affordable housing is provided.") in the preliminary application was 67 units. That number in this application is 79 units, which is a change of 17.9%. That change is less than 20% and thus the preliminary application remains effective.

The effective date of the preliminary application was 04/22/2025 and the project has met the SB 330 deadline of 10/19/2025 for submitting the full planning application. Therefore, only the applicable, objective general plan, zoning, and subdivision standards and criteria, including design review standards, in effect on 04/22/2025 may be applied to this development permit application.

HOUSING ACCOUNTABILITY ACT AND BUILDER'S REMEDY

The Project provides 7.59% of total units as defined in Gov. Code § 65915(o)(8)(A) for extremely low income households (or deeper affordability), and thus qualifies under Gov. Code § 65589.5(d) and (h)(3)(C)(i)(I) (i.e., HAA housing for mixed-income households 7% ELI) as a housing development project for very low, low-, or moderate-income households, and the "... local agency shall not disapprove the housing development project ... or condition approval in a manner that renders the housing development project ... infeasible ..." except in accordance with subdivision (d) of the Housing Accountability Act.

In accordance with Gov. Code § 65589.5(d)(6), (f)(6), and (h)(11) the Project is proposed as a "builder's remedy" project.

MINISTERIAL PROCESSING

The Project does not qualify for ministerial processing.

STATE DENSITY BONUS LAW ELIGIBILITY

The Project meets or exceeds the minimum eligibility qualifications to use the State Density Bonus Law (SDBL) in accordance with Gov. Code § 65915(b)(1)(B) by providing 6 very low income (or deeper affordability) units, which is 7.6% of total units, as defined in § 65915(o)(9).

PARKING REQUIRED

The Project requests a Concession to reduce parking requirements to zero. See under Concessions.

If the jurisdiction denies the Parking Concession in a manner that is legally permitted by the State Density Bonus Law, then the Project developer hereby requests that the jurisdiction not require a vehicular parking ratio exceeding the ratios specified in Gov. Code § 65915(p)(1). The jurisdiction "... shall not require a vehicular parking ratio, inclusive of parking for persons with a disability and guests ... that exceeds the following ratios:" 0 to 1 Bedroom: 1 onsite parking space; 2 to 3 Bedrooms: 1.5 onsite parking spaces; 4+ bedrooms: 2.5 parking spaces (on- or off-site); One bedspace in a student housing development: 0 parking spaces (on- or off-site).

The Parking Required and Parking Proposed for the Project is calculated and indicated under PARKING REQUIRED on Sheet GP0.02. The Parking Provided conveys the intent of the Applicant to provide some amount of parking and to provide the EV and ADA parking spaces required by State and Federal law. The Parking Provided shall not be considered Parking Required.

TOTAL DENSITY

TOTAL UNITS PROPOSED 105 UNITS

This is a builder's remedy project that is allowed a maximum base density of 98.9 units in accordance with Gov. Code § 65589.5(h)(11)(C)(i)(II) and Gov. Code § 65589.5(h)(11)(C)(ii)III. This number rounds up to 99 units in accordance with Gov. Code §65915(q). Pursuant to Gov. Code §65589.5(f)(6)(C)(ii) and (h)(11)(C), for a builder's remedy project the "base density" used to calculate a density bonus may be lower than, but not exceed, the greatest of the densities allowed by §65589.5(h)(11)(C). The project proposes 79 units of base density.

State Density Bonus Law allows up to 50 bonus units if the Project maxes out the "first" density bonus, plus up to 50 bonus units if the Project maxes out the "second" density bonus.

State ADU law allows up to 2 units of "lot-based" ADUs (2 ADUs per legal parcel with a proposed multifamily structure) per Gov. Code § 66323(a)(4)(iii).

The Project proposes 79 Base Units, 26 Bonus Units from the first density bonus, and 0 ADUs (not including ADUs that may be added after entitlement).

The maximum number of units allowed is 201, and the total number of units proposed by the Project is 105.

	Base Density	First Density Bonus	Second Density Bonus	ADUs	Total
Allowed Units	99 Units	50 Units	50 Units	2 Units	201 Units
Proposed Units	**79 Units**	**26 Units**	**Not Used**	**0 Units**	**105 Units**

BASE DENSITY

BUILDER'S REMEDY BASE UNITS PROPOSED 79 UNITS

Builder's Remedy Density — Base Units Allowed

The Project site has a total area of 25,471 sq ft (0.585 acres), per Survey, and a maximum base density, without builder's remedy, of 44.69 dwelling units per acre. The maximum base density is a blend of densities across land areas with different zoning and/or general plan designations. The maximum base density, without builder's remedy, is 26.1 units. This number rounds up to 27 units in accordance with Gov. Code §65915(q).

This is a builder's remedy project that is allowed a maximum base density of 98.9 units in accordance with Gov. Code § 65589.5(h)(11)(C)(i)(II) and Gov. Code § 65589.5(h)(11)(C)(ii)III. This number rounds up to 99 units in accordance with Gov. Code §65915(q). Pursuant to Gov. Code §65589.5(f)(6)(C)(ii) and (h)(11)(C), for a builder's remedy project the "base density" used to calculate a density bonus may be lower than, but not exceed, the greatest of the densities allowed by §65589.5(h)(11)(C). The project proposes 79 units of base density.

Lot	General Plan	Specific Plan	Zoning	Max DUA	Gross Lot Area	Source of Area	Unit Density
1	C-O		PA	45.00 DUA	24,947.00 Sq Ft	Survey	25.8 Units
2	R-UH		RM-2.5	30.00 DUA	524.00 Sq Ft	Survey	0.4 Units
3				0.00 DUA	0.00 Sq Ft	Survey	0.0 Units
Density Allowed by Gen. Plan, Spec. Plan, or Zoning				**44.69 DUA**	**25,471.00 Sq Ft**	**0.585 Acres**	**26.1 Units**

BONUS DENSITY

BONUS UNITS PROPOSED 26 UNITS

The Project seeks a density bonus in accordance with Gov. Code § 65915(b)(1)(B) by providing 6 VLI units (or lower), which is 7.59% of the 79 "total units" as defined in Gov. Code § 65915(o)(9). Because this is a builder's remedy project providing ELI units in accordance with Gov. Code § 65589.5(h)(3)(C)(i)(I), Gov. Code § 65589.5(f)(6)(C)(iv) requires that the Project "... shall be eligible for the same density bonus, incentives or concessions, and waivers or reductions of development standards as provided to a housing development project that dedicates three percentage points more units to very low income households ...." The percentage VLI is thus adjusted to 10.59%, which rounds down to 10%. The Project therefore qualifies for a 32.50% "first" density bonus of 26 units in accordance with Gov. Code § 65915(f)(2).

The Project is not applying for the "second" density bonus available pursuant to Gov. Code § 65915(v).

The Project qualifies for 26 bonus units, and proposes 26 bonus units.

BONUS UNITS ALLOWED (CALCULATED ON BUILDER'S REMEDY BASE UNITS PROPOSED)

	Base Units	Affordable Units	% Affordable	% Bonus	Bonus Units
First Density Bonus	79 Units	6 VLI units	10% VLI units*	32.50%	26 Units
Second Density Bonus	79 Units	Not Used	Not Used	Not Used	Not Used
Bonus Density Allowed				**32.50%**	**26 Units**

* This is a builder's remedy project and adds 3 percentage points to the % VLI units. Ref: Gov. Code § 65589.5(f)(6)(c)(iv).

LOT-BASED ADUs

LOT-BASED ADUs PROPOSED 0 UNITS

In accordance with Gov. Code § 66323(a)(4)(iii), State law requires that a local agency approve "[o]n a lot with a proposed multifamily dwelling, not more than two detached accessory dwelling units." The Project consists of 1 legal lot(s) on which a multifamily dwelling is proposed. Thus, the Project is allowed 2 such "lot-based" ADUs. However, no lot-based ADUs are proposed with this application.

EXISTING RESIDENTIAL UNITS & REPLACEMENT UNITS

The Project Site contains 1 existing residential units on an existing assessor parcel:

APN 022-481-21 contains one (1) one-bedroom, one-bath house, and no other residential units. The house has been rented to persons of unknown income category. This unit is subject to the replacement requirements of Gov. Code § 65915(c)(3), and a one-bedroom, one-bath unit in the new building will be deed restricted to VLI rents (or deeper affordability) and serve as the replacement unit for the existing house.

CONCESSIONS / INCENTIVES

Because this is a builder's remedy project providing ELI units in accordance with Gov. Code § 65589.5(h)(3)(C)(i)(I), Gov. Code § 65589.5(f)(6)(C)(iv) requires that the Project "... shall be eligible for the same ... incentives or concessions ... as provided to a housing development project that dedicates three percentage points more units to very low income households ...." The percentage VLI is thus adjusted to 10.59%, which rounds down to 10%. Because the project includes 10% of total units (excluding density bonus units) provided at VLI or deeper affordability, the Project qualifies for 2 concessions / incentives in accordance with Govt. Code § 65915(d)(2)(A)

The Project qualifies for an additional 2 concessions / incentives in accordance with Gov. Code § 65589.5(f)(6)(C)(ii), because the Project is a builder's remedy project. The Project qualifies for a total of 4 concessions / incentives.

The following concessions / incentives are proposed with this application. Concessions / incentives may be changed, added, or removed prior to final project approval.

CONCESSIONS / INCENTIVES — 4 AVAILABLE. 3 Used.

1. **Expedite Appeal Process** – In the event of any appeal of the Project or any of its approvals, the County shall hold a hearing to consider the appeal(s) before the Board of Supervisors within 15 calendar days after the expiration of the appeal period prescribed by Santa Cruz County Code. County shall not grant or allow any extension of the appeal period, except that upon request of the Applicant, County shall grant an extension specified by the Applicant not to exceed 75 calendar days beyond the 15 calendar day deadline to conduct the Board of Supervisors hearing. The Board of Supervisors shall not refer the appeal(s) to any subordinate decision-making body before deciding whether to approve or deny the appeal. County shall do all things necessary to effectuate this concession, including making timely public notices to allow for the expedited appeal before the Board of Supervisors. If any element of this concession is contrary to state law, the County shall expedite its decision on the appeal as nearly consistent with this concession as is allowed by state law. This concession/incentive is requested pursuant to Govt. Code §§ 65915(d) and 65915(k)(3). This concession will result in identifiable and actual cost reductions to provide for affordable housing costs. Appeals and their associated delays to final project approval impose substantial costs in the form of land carrying costs, fees to consultants, increases in construction costs due to inflation, etc.

2. **Priority Processing** – Applicant requests that upon making the determination that this development permit application is complete, the project will be immediately assigned to staff for processing in advance of all nonpriority applications (i.e., any development permit applicaiton that has not requested an incentive or concession for priority processing) including scheduling for environmental review (if required) and subsequent scheduling for public hearing and final action by the decision-making body or bodies. This concession/incentive is requested pursuant to Govt. Code §§ 65915(d) and 65915(k)(3). This concession will result in identifiable and actual cost reductions to provide for affordable housing costs. Accelerating final project approval saves substantial costs in the form of land carrying costs, increases in construction costs due to inflation, etc.

3. **Reduce the Parking Required by SCCC to zero spaces** – The parking required for the project by Santa Cruz Municipal Code (SCMC) shall be reduced to zero (0) spaces. The project owner intends to provide parking as indicated in the project plans, and to provide ADA and EV parking spaces as required by State and federal law. However, the development permit approval for this Project shall not require the project to provide any parking spaces. The project qualifies for parking reductions in accordance with the State Density Bonus Law. For clarity and conciseness, Applicant chooses to request this concession rather than invoking other potential parking reductions. The cost to construct parking spaces is a major component of a project's cost. This concession/incentive will result in identifiable and actual cost reductions to provide for affordable housing costs. This concession/incentive is requested pursuant to Gov. Code §§ 65915(d) and 65915(k)(1).

4.

WAIVERS / REDUCTIONS OF DEVELOPMENT STANDARDS

In accordance with Gov. Code 65915(e)(1), "In no case may a city, county, or city and county apply any development standard that will have the effect of physically precluding the construction of a development meeting the criteria of subdivision (b) at the densities or with the concessions or incentives permitted by this section. Subject to paragraph (3), an applicant may submit ... a proposal for the waiver or reduction of development standards ... ."

The court in *Wollmer v. City of Berkeley* found (emphasis added) "Standards may be waived that physically preclude construction of a housing development meeting the requirements for a density bonus, period."

The court in *Bankers Hill 150 v. City of San Diego* found (emphasis added) "unless one of the statutory exceptions applies, so long as a proposed housing development project meets the criteria of the Density Bonus Law by including the necessary affordable units, a city may not apply any development standard that would physically preclude construction of that project as designed, even if the building includes "amenities" beyond the bare minimum of building components."

It is mandatory for a jurisdiction to not apply development standards that would preclude a density bonus project as designed and proposed. A jurisdiction may not require the project to be redesigned to conform to any development standard that conflicts with the project's design. It is optional for an applicant to request a waiver.

The SDBL does not permit a jurisdiction to require any documentation for a waiver. However, to assist the Jurisdiction in complying with the SDBL prohibition on applying development standards that would physically preclude the Project as designed and proposed, the Applicant has identified the following development standards which, if applied, would physically preclude the Project, and hereby proposes that the Jurisdiction waive or reduce ALL conflicting development standards.

1. Floor Area Ratio (FAR)
2. Building Height
3. Setbacks
4. Parking
5. Usable Open Space
6. SCCC 13.11.075(A)(2)(a) requiring incorporation of mature trees. No on-site trees will be retained.

The following OVERARCHING Objective County of Santa Cruz Design Guidelines

- A4 On-Site Parking
- A5 Setbacks
- B1 Upper floor stepbacks
- D3 Parking and Access
- D8 Bike Parking
- F1 Stepped Massing
- G4 Tree Placement
- I4 Utility Screening

The following MULTIFAMILY RESIDENTIAL Objective County of Santa Cruz Design Guidelines

- A1 Building Placement - Neighborhoods
- A3 Building Orientation
- B1 Building Mass
- B5 Building Step-Backs
- C1 Private Open Space
- C2 Common Open Space

REFERENCES TO CODE SECTIONS ARE EXAMPLES AND FOR THE CONVENIENCE OF THE JURISDICTION. WAIVERS ARE REQUESTED FOR **ALL** DEVELOPMENT STANDARDS THAT WILL HAVE THE EFFECT OF PHYSICALLY PRECLUDING CONSTRUCTION OF THE PROJECT AS DESIGNED AND PROPOSED.

BELOW-MARKET-RATE HOUSING INFORMATION

LOCAL INCLUSIONARY HOUSING ORDINANCE

This Jurisdiction does not require inclusionary housing for the Project and/or Site.

SUMMARY OF BELOW-MARKET-RATE UNITS REQUIRED

The housing laws invoked by the Project, and the number of below-market-rate units required to satisfy each law, are shown in the below table. A unit designated to satisfy an inclusionary zoning requirement is included in the "total units" as defined in the SDBL, and if that unit also meets the requirements for an SDBL targeted unit, it counts as both an inclusionary unit and a targeted unit. (Gov. Code § 65915(o)(9)(A)(ii).) The definition of lower-income households includes very low income households and extremely low income households (Health and Safety Code § 50079.5); and the definition of very low income households includes extremely low income households (Health and Safety Code § 50105). Therefore VLI and ELI units satisfy LI requirements; and ELI units satisfy VLI requirements. The "Units Required" is the minimum number of units that will satisfy all of the laws in the table.

A concession/incentive can be used to modify a requirement of an inclusionary housing ordinance. This table represents the required inclusionary units (if any) without applying any concession/incentive on the inclusionary requirement.

Below-Market-Rate Units *Required* for Each Housing Law

Affordability Level	All Housing Laws Below-Market Units Required	State Density Bonus Law (SDBL)	Inclusionary Housing Not Required	HAA housing for mixed-income households 7% ELI	Not Used
Section 8	0 Units	0 Units	0 Units	0 Units	0 Units
MI units	0 Units	0 Units	0 Units	0 Units	0 Units
LI units	0 Units	0 Units	0 Units	0 Units	0 Units
VLI units	0 Units	6 Units	0 Units	0 Units	0 Units
ELI units	6 Units	0 Units	0 Units	6 Units	0 Units
ALI units	0 Units	0 Units	0 Units	0 Units	0 Units
Total Required	**6 Units**	**6 Units**	**0 Units**	**6 Units**	**0 Units**

SUMMARY OF BELOW-MARKET-RATE UNITS PROPOSED

The table below shows shows the "Units Provided to Satisfy All Housing Laws" at each affordability level. These are the units proposed for the approval of the housing development permit; the project may provide additional affordability to satisfy financing or other requirements.)

The units provided meet or exceed the number of units required to satisfy all housing laws (as shown in the table above), considering any concession/incentive (shown at left) that modifies an inclusionary housing ordinance.

- The two columns headed "Percentage of Total Units" show the units provided as a percentage of the "total units" as defined by Gov. Code 65915(o)(8) (i.e., the units in the project, including ADUs, but not including density bonus units).
- The the two columns headed "Percentage of All Units" show the units provided as a percentage of all of the units included in this housing development permit application, including density bonus units.
- The "Below-Market" columns show the percentage of units that are reserved for the specified affordability level.
- The "Lower-Income" columns show the percentage of units that are Low Income or a deeper level of affordability.

This data table is provided because different housing laws require calculation of percentages based on "total units" or "all units" and based on different affordability levels.

Below-Market-Rate Units *Provided* to Satisfy All Housing Laws

Affordability Level	Below-Market Units Provided	Percentage of Total Units: Below-Market	Percentage of Total Units: Lower-Income	Percentage of All Units: Below-Market	Percentage of All Units: Lower-Income
Section 8	0 Units	0.00%		0.00%	
MI units	0 Units	0.00%		0.00%	
LI units	0 Units	0.00%	0.00%	0.00%	0.00%
VLI units	0 Units	0.00%	0.00%	0.00%	0.00%
ELI units	6 Units	7.59%	7.59%	5.71%	5.71%
ALI units	0 Units	0.00%	0.00%	0.00%	0.00%
Total Proposed	**6 Units**	**7.59%**	**7.59%**	**5.71%**	**5.71%**

CONTINUED AFFORDABILITY OF AFFORDABLE UNITS FOR STATE DENSITY BONUS LAW

Applicant agrees to comply with all applicable provisions of Govt. Code § 65915(b) and (c), including the affordable rents and/or sale prices of units in the development.

In accordance with Govt. Code § 65915(c)(1)(A), applicant agrees to the continued affordability of all very low and low-income rental units that qualified the Project for the award of the density bonus for 55 years; or a longer period of time if required by the construction or mortgage financing assistance program, mortgage insurance program, or rental subsidy program.

UNITS TO BE DESIGNATED AS AFFORDABLE UNITS FOR STATE DENSITY BONUS LAW

The units within the development project that will be deed-restricted in accordance with Govt. Code § 65915(b) and (c) will be determined in accordance with all applicable State laws; and will be specified in the recorded affordable housing covenant. The Project plans do not identify the "targeted units" (i.e., the units deed-restricted as affordable units that qualify the Project for the benefits of the State Density Bonus Law (SDBL).

The SDBL does not require, and the local Jurisdiction may not require, the applicant to designate which specific units will be the targeted units. The SDBL does not require "dispersal" or "comparability" of the targeted units, and allows a development to "float" a deed restriction among units, such that the deed restricted units may change throughout the 55-year deed restriction.

However, local inclusionary housing requirements may require that specific units be designated as the inclusionary units, in which case such inclusionary units will be designated as required by the local Jurisdiction, unless a concession or incentive is used to modify such inclusionary housing requirement.

6

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Exhibit D

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SANTA CRUZ, CA 95065

60

LICENSED ARCHITECT · STATE OF CALIFORNIA

NOT FOR CONSTRUCTION

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ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
0	DRG SUBMITTAL	01.20.24
1	SB330	03.19.24
2	SB330 - 6 STORY	04.18.24
3	PLANNING SUBMITTAL	06.06.24
4	PLANNING SUBMITTAL	09.16.24
6	PLANNING REVISION	03.04.25
7	PLANNING REVISION	05-15-25

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	LB
Checked by	EB
Scale	NTS

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STATE HOUSING LAW & PROJECT INFO

GP0.01

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BUILDING GROSS AREA

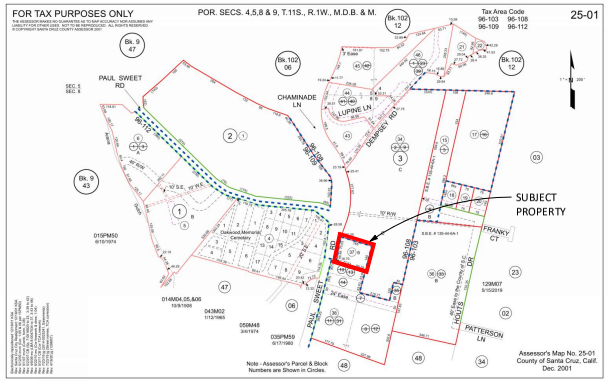
LEVEL	RESIDENTIAL	CIRCULATION	PARKING	AMENITY	SERVICE / MECH.	STORAGE	TOTALS
PIT	0 SF	0 SF	0 SF	0 SF	730 SF	0 SF	730 SF
LEVEL 1	0 SF	1,156 SF	17,608 SF	776 SF	866 SF	639 SF	21,046 SF
LEVEL 2	10,657 SF	2,795 SF	0 SF	178 SF	399 SF	0 SF	14,029 SF
LEVEL 3	10,656 SF	2,796 SF	0 SF	178 SF	398 SF	0 SF	14,028 SF
LEVEL 4	10,656 SF	2,794 SF	0 SF	178 SF	400 SF	0 SF	14,027 SF
LEVEL 5	10,655 SF	2,794 SF	0 SF	179 SF	401 SF	0 SF	14,029 SF
LEVEL 6	10,656 SF	2,795 SF	0 SF	178 SF	400 SF	0 SF	14,029 SF
GRAND TOTALS	53,280 SF	15,131 SF	17,608 SF	1,665 SF	3,594 SF	639 SF	91,917 SF

PROJECT - UNIT TOTAL COUNT

UNIT TYPE	COUNT
STUDIO	30
JR 1 BED	55
1 BED	5
2 BED	15
TOTAL	105

Correction date: 01/06/2026

ASSESSORS MAP



PROJECT DATA

APN:	025-013-37
LOT SIZE:	25,471 SF
LLA #241094 WILL BE RECORDED PRIOR TO BUILDING PERMIT ISSUANCE, INCREASING THE AREA OF THE APN 025-013-37 FROM 22,666 TO 25,471, PER SURVEY	
APPLICANT HAS IDENTIFIED THE R-UHF GENERAL PLAN DESIGNATION AND RF ZONING DESIGNATION AS FACILITATING THIS BUILDER'S REMEDY PROJECT. IN ACCORDANCE WITH GOV CODE § 65589.5(f)(6)(A).	
ZONING DISTRICT:	PA & RM-2.5
LAND USE DESIGNATION:	C-O & R-UH
COASTAL ZONE:	NO
URBAN SERVICES LINE:	YES
BUILDING CONSTRUCTION TYPE:	TYPE I-A: 21,776 GSF TYPE III-A 70,141 GSF
BUILDING OCCUPANCIES:	R-2 (RESIDENTIAL) S-2 (GARAGE) B (OFFICE AND AMENITY)
EXISTING MAIN HOUSE AREA:	737 GSF - PER ASSESSOR
EXISTING OUTBUILDING:	329 GSF - PER SURVEY
EXISTING SHED:	127 GSF - PER SURVEY
EXISTING CARPORT:	190 GSF - PER SURVEY
TOTAL:	1,383 GSF
PROPOSED RESIDENTIAL AREA:	70,141 GSF
EXISTING LOT COVERAGE:	6%
NEW LOT COVERAGE:	85% (21,777/25,471=.85)
ALLOWED FLOOR AREA RATIO (FAR):	**PA & RM2.5 & RF:** 1.5
PROPOSED FLOOR AREA RATIO (FAR):	3.61 SDBL WAIVER

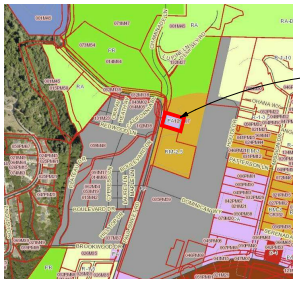
ALLOWABLE AREA ANALYSIS

3900 Paul Sweet Rd — 3400 Paul Sweet Rd, Santa Cruz, CA — Project # 22140 — W NORRIS

BUILDING	OCCUPANCY GROUP	CONSTRUCTION TYPE	SPRINKLER TYPE	HEIGHT (SEC TABLE 504.3 IN FT) ACTUAL	HEIGHT (SEC TABLE 504.3 IN FT) ALLOWABLE	STORIES (SEC TABLE 504.4) ACTUAL	STORIES (SEC TABLE 504.4) ALLOWABLE	FLOOR AREA PER FLOOR (SEC TABLE 506.2 AND 506.3 & 5.1.5 EXCEPTION 5, 1 IN SQUARE FEET) ALL LEVELS ACTUAL	FLOOR AREA PER FLOOR (SEC TABLE 506.2 AND 506.3 & 5.1.5 EXCEPTION 5, 1 IN SQUARE FEET) ALL LEVELS ALLOWABLE	BUILDING FLOOR AREA (SEC TABLE 506.2 AND 506.3 EQUATION 5.1, IN SQUARE FEET) ACTUAL	BUILDING FLOOR AREA (SEC TABLE 506.2 AND 506.3 EQUATION 5.1, IN SQUARE FEET) ALLOWABLE
Standard A-1	A-2	II-A	NFPA 13	50'	85'	1	3	7,470	21,000	15,000	63,000
Standard A-2	A-2	II-A	NFPA 13	50'	85'	1	3	7,470	21,000	15,000	63,000
Patio A	S-2	II-A	NFPA 13	50'	Unlimited	1	Unlimited	37,843	Unlimited	37,843	Unlimited

ALLOWABLE BUILDING AREA PER FLOOR (SEC B.5.1 EQ 5.1)		
Allowable Area (sqft)	As	24,000
Tabular Area Allowed per Table 506.2	At	24,000
Allowable Area per Table 506.2 Note d Open Space on Buildings	Na	24,000
Increase Due to Sprinkler per 5.1.5.1	If	1

ZONING MAP



PLANNING CODE NOTES

BUILDING HEIGHT — SDBL WAIVER
HT. LIMIT: **ALLOWABLE:** 3 STORIES OR 35' **PA & RM2.5:** 3 STORIES OR 40' **RF:**
PROVIDED: 6 STORIES, SEE ELEVATIONS

SETBACKS — SDBL WAIVER
SETBACKS: *SCCC 13.10.334(A2) COMMERCIAL DISTRICTS*

	PA & RM2.5:	RF:
FRONT:	10'	10'
SIDE INTERIOR:	10'	5'
SIDE EXTERIOR:	10'	8'
REAR:	10'	15'

PROPERTY ABUTS AN RM DISTRICT. SEE PLANS FOR SETBACKS PROVIDED

PARKING — SDBL WAIVER

SCC 13.16.050-1

REQUIRED:
95 units less than 750 square feet (1 space per unit): 95 spaces
10 units greater than 750 square feet (2 spaces per unit): 20 spaces
95+20= 115 total required residential spaces
+ 20% guest parking: 115*0.2= 23 guest parking spaces
115 + 23 = 138 total spaces required

Correction date: 01/06/2026

SDBL

REQUIRED:
RESIDENTIAL-113 SPACES REQUIRED PER STATE DENSITY BONUS
(1 SPACE PER STUDIO ,1 SPACE PER 1 BEDROOM, 1.5 SPACES PER 2 BEDROOM INCLUSIVE OF PARKING FOR PERSONS WITH DISABILITIES)

CGSBC 4.106.4.2

REQUIRED:
NOTE: PARKING SPACES ACCESSIBLE BY MECHANICAL SYSTEM ARE EXEMPT FROM PROVIDING EV RECEPTACLES
27 STALLS EV READY LOW VOLTAGE RECEPTACLE
40% OF 68 PROVIDED PARKING REQUIRED TO BE EV LOW VOLTAGE RECEPTACLE

REQUIRED:
NOTE: **7 STALL(S) EV CHARGERS**
10% OF 68 PROVIDED PARKING REQUIRED TO HAVE CHARGER

PROVIDED: PER SDBL WAIVER
68 GARAGE PARKING STALLS OF WHICH, 22 ARE CAR PUZZLER SPACES, 7 ARE EV CHARGING, 27 ARE EV LOW VOLTAGE RECEPTACLE, 2 ADA STALLS, ONE OF WHICH IS AN ADA VAN STALL. ALL PARKING IS ASSIGNED TO RESIDENTS.

BICYCLE PARKING
TABLE 13.16.040-1

SEE AP9.02 FOR MORE INFO ON BICYCLE PARKING

REQUIRED: 126 CLASS-I SPACES RESIDENTIAL (1 SPACE / UNIT+20% GUEST)
26 CLASS-II SPACES RESIDENTIAL (1 SPACE / 4 UNITS)

PROVIDED: 127 CLASS-I SPACES RESIDENTIAL (1 SPACE / UNIT+20% GUEST)
26 CLASS-II SPACES RESIDENTIAL (1 SPACE / 4 UNITS)

USABLE OPEN SPACE — SDBL WAIVER
SCCC 13.10.334(A2)

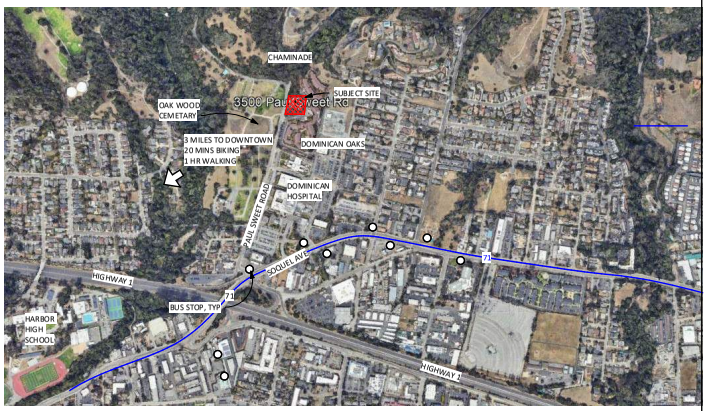
	PA & RM2.5:	RF:
REQUIRED GROUP:	5,250 SF *MIN. 50SF / DWELLING*	5,094.2 SF *20% GROSS SITE AREA*
PROVIDED GROUP:	3,894 SF	
PA & RM2.5 & RF:		
REQUIRED PRIVATE:	53 PRIVATE OUTDOOR SPACES *6X6' MIN AREA FOR 50% OF UNITS*	
PROVIDED PRIVATE:	75 PRIVATE TERRACES / BALCONIES	

SEE SHEET GP0.04 FOR OPEN SPACE EXHIBIT

ADDITIONAL SITE CONDITIONS

POINT SOURCE AIR/WATER POLLUTANTS:	NO	HISTORIC/CULTURAL RESOURCES:	NO
VERY HIGH FIRE SEVERITY ZONE:	NO	SPECIES OF CONCERN:	NO
WETLANDS:	NO	RECORDED PUBLIC EASEMENTS: **SANITARY SEWER EASEMENT RECORDED BOOK 1256, PAGE 135**	YES
HAZARDOUS WASTE SITE:	NO	COASTAL ZONE:	NO
SPECIAL FLOOD HAZARD AREA SUBJECT TO INUNDATION BY 100-YEAR FLOOD:	NO	STREAM OR OTHER RESOURCE:	NO
DELINEATED EARTHQUAKE FAULT ZONE:	NO	ANY APPROVALS UNDER THE SUBDIVISION MAP ACT, INCLUDING, BUT NOT LIMITED TO, A PARCEL MAP, A TENTATIVE MAP, OR A CONDOMINIUM MAP, BEING REQUESTED	NO

CONTEXT & MOBILITY



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LICENSED ARCHITECT JAY BRANDT CALIFORNIA
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ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
0	DRB SUBMITTAL	01.20.24
1	SB330	03.19.24
2	SB330 - 6 STORY	04.18.24
3	PLANNING SUBMITTAL	06.06.24
4	PLANNING SUBMITTAL	09.16.24
5	RESPONSE TO PLANNING COMMENTS	01.30.25
6	PLANNING REVISION	03.04.25
7	PLANNING REVISION	05.15.25

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	LB
Checked by	EB
Scale	NTS

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PROJECT INFO

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Drawn by	OH
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EXISTING SITE PHOTOS

GP0.03

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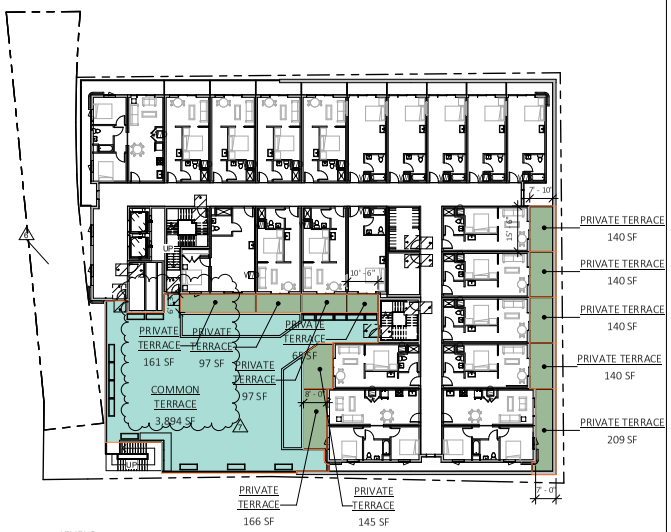
5 LEVEL 5
1" = 20'-0"

4 LEVEL 4
1" = 20'-0"

3 LEVEL 3
1" = 20'-0"



2 LEVEL 2
1" = 20'-0"

OPEN SPACE / AMENITY LEGEND

GROUP

PRIVATE

OPEN SPACE	
LEVEL	AREA
GROUP	
LEVEL 2	3,894 SF
	3,894 SF
PRIVATE	
LEVEL 2	1,501 SF
LEVEL 3	959 SF
LEVEL 4	938 SF
LEVEL 5	937 SF
LEVEL 6	958 SF
Subtotal	5,293 SF
Grand total	9,188 SF

COUNTY OF SANTA CRUZ SHARED OPEN SPACE REQUIREMENTS
PER 13.10.334 (A2)

TOTAL UNIT COUNT	105 UNITS
GROUP USABLE OPEN SPACE REQ'D (20% GROSS SITE AREA)	5,094.2 GSF
TOTAL SHARED GROUP OPEN SPACE PROVIDED	**3,894 GSF**
PRIVATE USABLE OPEN SPACE REQ'D (50 GSF / UNIT FOR 50% OF UNITS)	53 OUTDOOR SPACES 2,625 SF
TOTAL PRIVATE OPEN SPACES PROVIDED (50 GSF TO 191 GSF, REFER TO PLANS)	LEVEL 1: 0 SPACES LEVEL 2: 11 SPACES LEVEL 3: 16 SPACES LEVEL 4: 16 SPACES LEVEL 5: 16 SPACES LEVEL 6: 16 SPACES **75 BALCONIES / TERRACES** **5,293 SF**

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Drawn by	OH
Checked by	EB
Scale	As indicated

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OPEN SPACE EXHIBIT

GP0.04

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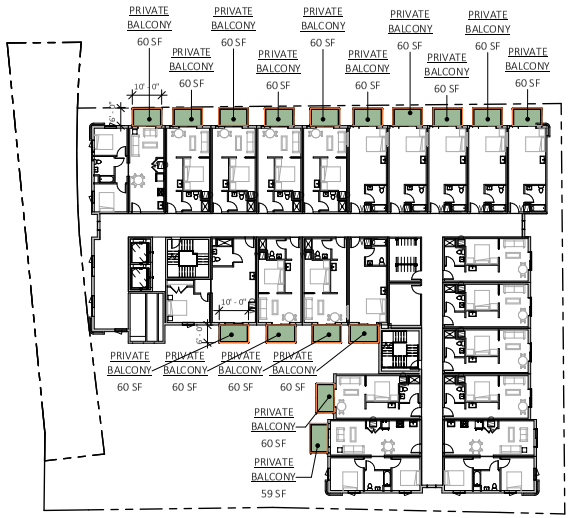

1 LEVEL 6
1" = 20'-0"

OPEN SPACE	
LEVEL	AREA
GROUP	
LEVEL 2	3,894 SF
	3,894 SF

PRIVATE	
LEVEL 2	1,501 SF
LEVEL 3	959 SF
LEVEL 4	938 SF
LEVEL 5	937 SF
LEVEL 6	958 SF
	5,293 SF
Grand total	9,188 SF

COUNTY OF SANTA CRUZ SHARED OPEN SPACE REQUIREMENTS

PER 13.10.334 (A2)

TOTAL UNIT COUNT	105 UNITS
GROUP USABLE OPEN SPACE REQ'D *(20% GROSS SITE AREA)*	5,094.2 GSF
TOTAL SHARED GROUP OPEN SPACE PROVIDED	**3,894 GSF**
PRIVATE USABLE OPEN SPACE REQ'D *(50 GSF / UNIT FOR 50% OF UNITS)*	53 OUTDOOR SPACES 2,625 SF
TOTAL PRIVATE OPEN SPACES PROVIDED *(50 GSF TO 191 GSF, AVER TO 74 AVG)*	LEVEL 1: 0 SPACES LEVEL 2: 11 SPACES LEVEL 3: 16 SPACES LEVEL 4: 16 SPACES LEVEL 5: 16 SPACES LEVEL 6: 16 SPACES **75 BALCONIES / TERRACES** **5,293 SF**

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LICENSED ARCHITECT JAY CALIFORNIA
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OPEN SPACE EXHIBIT

GP0.05

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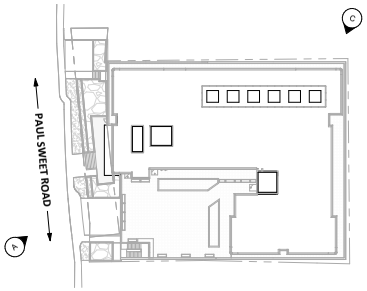
A: VIEW FROM PAUL SWEET ROAD

B: SOUTH ELEVATION VIEW FROM DOMINICAN OAKS

C: VIEW FROM ADJACENT PROPERTY



TRUE NORTH

PROJECT NORTH

5/15/2025 2:28:09 PM

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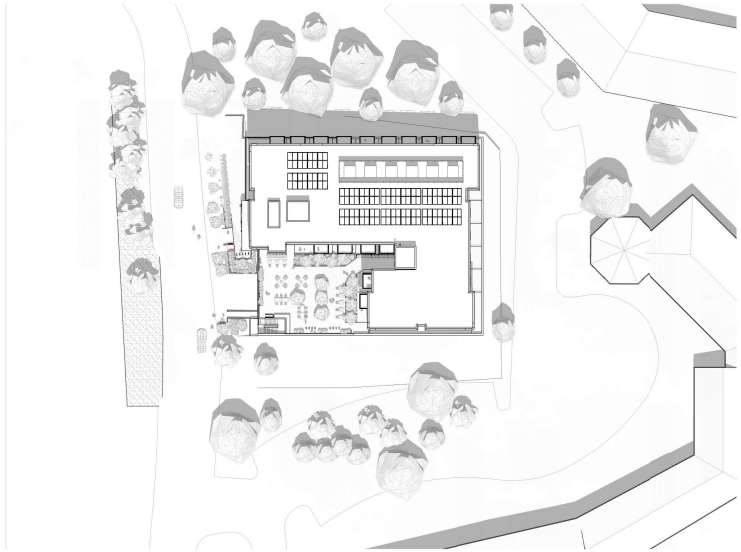
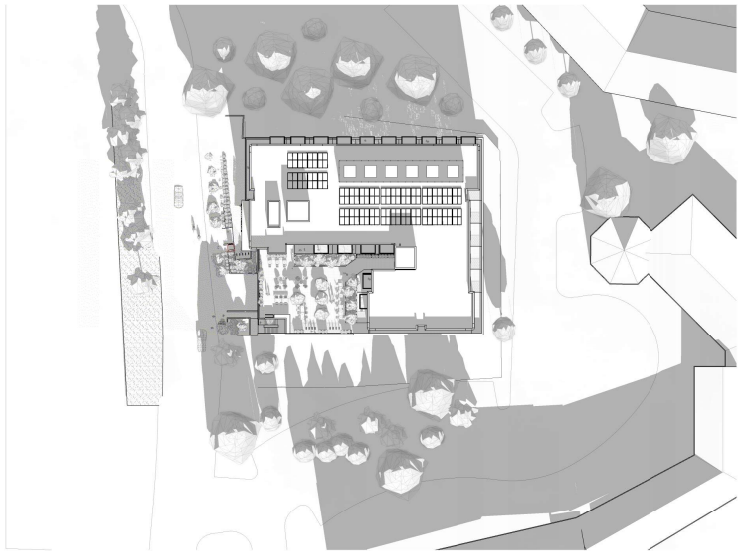
RENDERING & 3D EXHIBITS

GP0.06

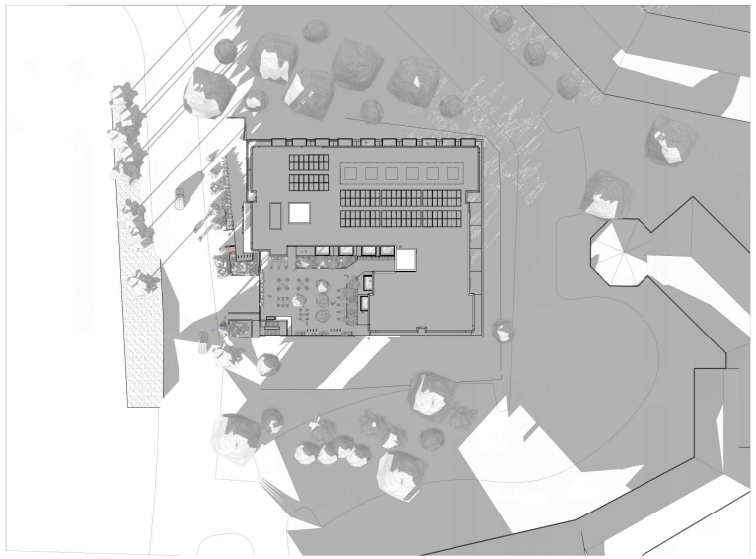


4 SHADOW STUDY - JUNE 21 - 10AM

3 SHADOW STUDY - JUNE 21 - 2PM



2 SHADOW STUDY - DEC 21 - 10AM



1 SHADOW STUDY - DEC 21 - 2PM

TRUE NORTH

PROJECT NORTH

5/15/2025 2:30:59 PM

workbench

189 WALNUT AVENUE
SANTA CRUZ, CA 95060
WORKBENCHBUILT.COM
P: 831.227.2217

Exhibit D

3500 PAUL SWEET ROAD

3500 PAUL SWEET ROAD
SANTA CRUZ, CA 95065

LICENSED ARCHITECT JAY CALIFORNIA

NOT FOR CONSTRUCTION

NOT FOR CONSTRUCTION

ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
0	DRG SUBMITTAL	01.20.24
1	SB330	03.19.24
2	SB330 - 6 STORY	04.18.24
3	PLANNING SUBMITTAL	06.06.24
4	PLANNING SUBMITTAL	09.16.24
5	RESPONSE TO PLANNING COMMENTS	01.30.25

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	OH
Checked by	EB
Scale	NTS

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SHADOW STUDY

GP0.07

2022 CALIFORNIA GREEN BUILDING STANDARDS CODE
RESIDENTIAL MANDATORY MEASURES, SHEET 1 (January 2023)

AIA California

Y = YES
N/A = NOT APPLICABLE
RESPON. PARTY = RESPONSIBLE PARTY (ie: ARCHITECT, ENGINEER, OWNER, CONTRACTOR, INSPECTOR ETC.)

Y | N/A | RESPON. PARTY

CHAPTER 3
GREEN BUILDING
SECTION 301 GENERAL

301.1 SCOPE. Buildings shall be designed to include the green building measures specified as mandatory in the application checklists contained in this code. Voluntary green building measures are also included in the application checklists and may be included in the design and construction of structures covered by this code, but are not required unless adopted by a city, county, or city and county as specified in Section 101.7.

301.1.1 Additions and alterations. [HCD] The mandatory provisions of Chapter 4 shall be applied to additions or alterations of existing residential buildings where the addition or alteration increases the building's conditioned area, volume, or size. The requirements shall apply only to and/or within the specific area of the addition or alteration.

The mandatory provision of Section 4.106.4.2 may apply to additions or alterations of existing parking facilities or the addition of new parking facilities serving existing multifamily buildings. See Section 4.106.4.3 for application.

Note: Repairs including, but not limited to, resurfacing, restriping and repairing or maintaining existing lighting fixtures are not considered alterations for the purpose of this section.

Note: On and after January 1, 2014, residential buildings undergoing permitted alterations, additions, or improvements shall replace noncompliant plumbing fixtures with water-conserving plumbing fixtures. Plumbing fixture replacement is required prior to issuance of a certificate of final completion, certificate of occupancy or final permit approval by the local building department. See Civil Code Section 1101.1, et seq., for the definition of a noncompliant plumbing fixture, types of residential buildings affected and other important enactment dates.

301.2 LOW-RISE AND HIGH-RISE RESIDENTIAL BUILDINGS. [HCD] The provisions of individual sections of CALGreen may apply to either low-rise residential buildings high-rise residential buildings, or both. Individual sections will be designated by banners to indicate where the section applies specifically to low-rise only (LR) or high-rise only (HR). When the section applies to both low-rise and high-rise buildings, no banner will be used.

SECTION 302 MIXED OCCUPANCY BUILDINGS

302.1 MIXED OCCUPANCY BUILDINGS. In mixed occupancy buildings, each portion of a building shall comply with the specific green building measures applicable to each specific occupancy.
Exceptions:
1. [HCD] Accessory structures and accessory occupancies serving residential buildings shall comply with Chapter 4 and Appendix A4, as applicable.
2. [HCD] For purposes of CALGreen, live/work units, complying with Section 419 of the *California Building Code*, shall not be considered mixed occupancies. Live/Work units shall comply with Chapter 4 and Appendix A4, as applicable.

DIVISION 4.1 PLANNING AND DESIGN

ABBREVIATION DEFINITIONS:

HCD	Department of Housing and Community Development
BSC	California Building Standards Commission
DSA-SS	Division of the State Architect, Structural Safety
OSHPD	Office of Statewide Health Planning and Development
LR	Low Rise
HR	High Rise
AA	Additions and Alterations
N	New

CHAPTER 4
RESIDENTIAL MANDATORY MEASURES

SECTION 4.102 DEFINITIONS
4.102.1 DEFINITIONS
The following terms are defined in Chapter 2 *(and are included here for reference)*

FRENCH DRAIN. A trench, hole or other depressed area loosely filled with rock, gravel, fragments of brick or similar pervious material used to collect or channel drainage or runoff water.

WATTLES. Wattles are used to reduce sediment in runoff. Wattles are often constructed of natural plant materials such as hay, straw or similar material shaped in the form of tubes and placed on a downflow slope. Wattles are also used for perimeter and inlet controls.

4.106 SITE DEVELOPMENT
4.106.1 GENERAL. Preservation and use of available natural resources shall be accomplished through evaluation and careful planning to minimize negative effects on the site and adjacent areas. Preservation of slopes, management of storm water drainage and erosion controls shall comply with this section.

4.106.2 STORM WATER DRAINAGE AND RETENTION DURING CONSTRUCTION. Projects which disturb less than one acre of soil and are not part of a larger common plan of development which in total disturbs one acre or more, shall manage storm water drainage during construction. In order to manage storm water drainage during construction, one or more of the following measures shall be implemented to prevent flooding of adjacent property, prevent erosion and retain soil runoff on the site.

1. Retention basins of sufficient size shall be utilized to retain storm water on the site.
2. Where storm water is conveyed to a public drainage system, collection point, gutter or similar disposal method, water shall be filtered by use of a barrier system, wattle or other method approved by the enforcing agency.
3. Compliance with a lawfully enacted storm water management ordinance.

Note: Refer to the State Water Resources Control Board for projects which disturb one acre or more of soil, or are part of a larger common plan of development which in total disturbs one acre or more of soil.

(Website: https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html)

4.106.3 GRADING AND PAVING. Construction plans shall indicate how the site grading or drainage system will manage all surface water flows to keep water from entering buildings. Examples of methods to manage surface water include, but are not limited to, the following:

1. Swales
2. Water collection and disposal systems
3. French drains
4. Water retention gardens
5. Other water measures which keep surface water away from buildings and aid in groundwater recharge.

Exception: Additions and alterations not altering the drainage path.

4.106.4 Electric vehicle (EV) charging for new construction. New construction shall comply with Sections 4.106.4.1 or 4.106.4.2 to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the *California Electrical Code*, Article 625.

Exceptions:
1. On a case-by-case basis, where the local enforcing agency has determined EV charging and infrastructure are not feasible based upon one or more of the following conditions:
1.1 Where there is no local utility power supply or the local utility is unable to supply adequate power.
1.2 Where there is evidence suitable to the local enforcing agency substantiating that additional local utility infrastructure design requirements, directly related to the implementation of Section 4.106.4, may adversely impact the construction cost of the project.
2. Accessory Dwelling Units (ADU) and Junior Accessory Dwelling Units (JADU) without additional parking facilities.

4.106.4.1 New one- and two-family dwellings and townhouses with attached private garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or subpanel shall provide capacity to install a 40-ampere 208/240-volt minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device.

Exemption: A raceway is not required if a minimum 40-ampere 208/240-volt dedicated EV branch circuit is installed in close proximity to the proposed location of an EV charger at the time of original construction in accordance with the *California Electrical Code*.

4.106.4.1.1 Identification. The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging as "EV CAPABLE". The raceway termination location shall be permanently and visibly marked as "EV CAPABLE".

4.106.4.2 New multifamily dwellings, hotels and motels and new residential parking facilities.
When parking is provided, parking spaces for new multifamily dwellings, hotels and motels shall meet the requirements of Sections 4.106.4.2.1 and 4.106.4.2.2. Calculations for spaces shall be rounded up to the nearest whole number. A parking space served by electric vehicle supply equipment or designed as a future EV charging space shall count as at least one standard automobile parking space only for the purpose of complying with any applicable minimum parking space requirements established by a local jurisdiction. See Vehicle Code Section 22511.2 for further details.

4.106.4.2.1Multifamily development projects with less than 20 dwelling units; and hotels and motels with less than 20 sleeping units or guest rooms.
The number of dwelling units, sleeping units or guest rooms shall be based on all buildings on a project site subject to this section.

1.EV Capable. Ten (10) percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level 2 EVSE. Electrical load calculations shall demonstrate that the electrical panel service capacity and electrical system, including any on-site distribution transformer(s), have sufficient capacity to simultaneously charge all EVs at all required EV spaces at a minimum of 40 amperes.

The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging purposes as "EV CAPABLE" in accordance with the California Electrical Code.

Exceptions:

1.When EV chargers (Level 2 EVSE) are installed in a number equal to or greater than the required number of EV capable spaces.

2.When EV chargers (Level 2 EVSE) are installed in a number less than the required number of EV capable spaces, the number of EV capable spaces required may be reduced by a number equal to the number of EV chargers installed.

Notes:

a.Construction documents are intended to demonstrate the project's capability and capacity for facilitating future EV charging.

b.There is no requirement for EV spaces to be constructed or available until receptacles for EV charging or EV chargers are installed for use.

2.EV Ready. Twenty-five (25) percent of the total number of parking spaces shall be equipped with low power Level 2 EV charging receptacles. For multifamily parking facilities, no more than one receptacle is required per dwelling unit when more than one parking space is provided for use by a single dwelling unit.

Exception: Areas of parking facilities served by parking lifts.

4.106.4.2.2 Multifamily development projects with 20 or more dwelling units, hotels and motels with 20 or more sleeping units or guest rooms.
The number of dwelling units, sleeping units or guest rooms shall be based on all buildings on a project site subject to this section.

1.EV Capable. Ten (10) percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level 2 EVSE. Electrical load calculations shall demonstrate that the electrical panel service capacity and electrical system, including any on-site distribution transformer(s), have sufficient capacity to simultaneously charge all EVs at all required EV spaces at a minimum of 40 amperes.

The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging purposes as "EV CAPABLE" in accordance with the California Electrical Code.

Exception: When EV chargers (Level 2 EVSE) are installed in a number greater than five (5) percent of parking spaces required by Section 4.106.4.2.2, Item 3, the number of EV capable spaces required may be reduced by a number equal to the number of EV chargers installed over the five (5) percent required.

Notes:

a.Construction documents shall show locations of future EV spaces.

b.There is no requirement for EV spaces to be constructed or available until receptacles for EV charging or EV chargers are installed for use.

2.EV Ready. Twenty-five (25) percent of the total number of parking spaces shall be equipped with low power Level 2 EV charging receptacles. For multifamily parking facilities, no more than one receptacle is required per dwelling unit when more than one parking space is provided for use by a single dwelling unit.

Exception: Areas of parking facilities served by parking lifts.

3.EV Chargers. Five (5) percent of the total number of parking spaces shall be equipped with Level 2 EVSE. Where common use parking is provided, at least one EV charger shall be located in the common use parking area and shall be available for use by all residents or guests.

When low power Level 2 EV charging receptacles or Level 2 EVSE are installed beyond the minimum required, an automatic load management system (ALMS) may be used to reduce the maximum required electrical capacity to each space served by the ALMS. The electrical system and any on-site distribution transformers shall have sufficient capacity to deliver at least 3.3 kW simultaneously to each EV charging station (EVCS) served by the ALMS. The branch circuit shall have a minimum capacity of 40 amperes, and installed EVSE shall have a capacity of not less than 30 amperes. ALMS shall not be used to reduce the minimum required electrical capacity to the required EV capable spaces.

4.106.4.2.2.1 Electric vehicle charging stations (EVCS).
Electric vehicle charging stations required by Section 4.106.4.2.2, Item 3, shall comply with Section 4.106.4.2.2.1.

Exception: Electric vehicle charging stations serving public accommodations, public housing, motels and hotels shall not be required to comply with this section. See California Building Code, Chapter 11B, for applicable requirements.

4.106.4.2.2.1.1 Location.
EVCS shall comply with at least one of the following options:

1.The charging space shall be located adjacent to an accessible parking space meeting the requirements of the California Building Code, Chapter 11A, to allow use of the EV charger from the accessible parking space.

2.The charging space shall be located on an accessible route, as defined in the California Building Code, Chapter 2, to the building.

Exception: Electric vehicle charging stations designed and constructed in compliance with the California Building Code, Chapter 11B, are not required to comply with Section 4.106.4.2.2.1.1 and Section 4.106.4.2.2.1.2, Item 3.

4.106.4.2.2.1.2 Electric vehicle charging stations (EVCS) dimensions.
The charging spaces shall be designed to comply with the following:

1.The minimum length of each EV space shall be 18 feet (5486 mm).

2.The minimum width of each EV space shall be 9 feet (2743 mm).

3.One in every 25 charging spaces, but not less than one, shall also have an 8-foot (2438 mm) wide minimum aisle. A 5-foot (1524 mm) wide minimum aisle shall be permitted provided the minimum width of the EV space is 12 feet (3658 mm).

a.Surface slope for this EV space and the aisle shall not exceed 1 unit vertical in 48 units horizontal (2.083 percent slope) in any direction.

4.106.4.2.2.1.3 Accessible EV spaces.
In addition to the requirements in Sections 4.106.4.2.2.1.1 and 4.106.4.2.2.1.2, all EVSE, when installed, shall comply with the accessibility provisions for EV chargers in the California Building Code, Chapter 11B. EV ready spaces and EVCS in multifamily developments shall comply with California Building Code, Chapter 11A, Section 1109A.

4.106.4.2.3 EV space requirements.
1.Single EV space required. Install a listed raceway capable of accommodating a 208/240-volt dedicated branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box or enclosure in close proximity to the location or the proposed location of the EV space. Construction documents shall identify the raceway termination point, receptacle or charger location, as applicable. The service panel and/ or subpanel shall have a 40-ampere minimum dedicated branch circuit, including branch circuit overcurrent protective device installed, or space(s) reserved to permit installation of a branch circuit overcurrent protective device.

Exception: A raceway is not required if a minimum 40-ampere 208/240-volt dedicated EV branch circuit is installed in close proximity to the location or the proposed location of the EV space, at the time of original construction in accordance with the California Electrical Code.

2.Multiple EV spaces required. Construction documents shall indicate the raceway termination point and the location of installed or future EV spaces, receptacles or EV chargers. Construction documents shall also provide information on amperage of installed or future receptacles or EVSE, raceway method(s), wiring schematics and electrical load calculations. Plan design shall be based upon a 40-ampere minimum branch circuit. Required raceways and related components that are planned to be installed underground, enclosed, inaccessible or in concealed areas and spaces shall be installed at the time of original construction.

Exception: A raceway is not required if a minimum 40-ampere 208/240-volt dedicated EV branch circuit is installed in close proximity to the location or the proposed location of the EV space at the time of original construction in accordance with the California Electrical Code.

4.106.4.2.4 Identification.
The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging purposes as "EV CAPABLE" in accordance with the California Electrical Code.

4.106.4.2.5 Electric Vehicle Ready Space Signage.
Electric vehicle ready spaces shall be identified by signage or pavement markings, in compliance with Caltrans Traffic Operations Policy Directive 13-01 (Zero Emission Vehicle Signs and Pavement Markings) or its successor(s).

4.106.4.3 Electric vehicle charging for additions and alterations of parking facilities serving existing multifamily buildings.
When new parking facilities are added, or electrical systems or lighting of existing parking facilities are added or altered and the work requires a building permit, ten (10) percent of the total number of parking spaces added or altered shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level 2 EVSE.

Notes:

1.Construction documents are intended to demonstrate the project's capability and capacity for facilitating future EV charging.

2.There is no requirement for EV spaces to be constructed or available until EV chargers are installed for use.

DIVISION 4.2 ENERGY EFFICIENCY

4.201 GENERAL
4.201.1 SCOPE. For the purposes of mandatory energy efficiency standards in this code, the California Energy Commission will continue to adopt mandatory standards.

DIVISION 4.3 WATER EFFICIENCY AND CONSERVATION

4.303 INDOOR WATER USE
4.303.1 WATER CONSERVING PLUMBING FIXTURES AND FITTINGS. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the sections 4.303.1.1, 4.303.1.2, 4.303.1.3, and 4.303.4.4.

Note: All noncompliant plumbing fixtures in any residential real property shall be replaced with water-conserving plumbing fixtures. Plumbing fixture replacement is required prior to issuance of a certificate of final completion, certificate of occupancy, or final permit approval by the local building department. See Civil Code Section 1101.1, et seq., for the definition of a noncompliant plumbing fixture, types of residential buildings affected and other important enactment dates.

4.303.1.1 Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush. Tank-type water closets shall be certified to the performance criteria of the U.S. EPA WaterSense Specification for Tank-type Toilets.

Note: The effective flush volume of dual flush toilets is defined as the composite, average flush volume of two reduced flushes and one full flush.

4.303.1.2 Urinals. The effective flush volume of wall mounted urinals shall not exceed 0.125 gallons per flush. The effective flush volume of all other urinals shall not exceed 0.5 gallons per flush.

4.303.1.3 Showerheads.

4.303.1.3.1 Single Showerhead. Showerheads shall have a maximum flow rate of not more than 1.8 gallons per minute at 80 psi. Showerheads shall be certified to the performance criteria of the U.S. EPA WaterSense Specification for Showerheads.

4.303.1.3.2 Multiple showerheads serving one shower. When a shower is served by more than one showerhead, the combined flow rate of all the showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi, or the shower shall be designed to only allow one shower outlet to be in operation at a time.

Note: A hand-held shower shall be considered a showerhead.

4.303.1.4 Faucets.

4.303.1.4.1 Residential Lavatory Faucets. The maximum flow rate of residential lavatory faucets shall not exceed 1.2 gallons per minute at 60 psi. The minimum flow rate of residential lavatory faucets shall not be less than 0.8 gallons per minute at 20 psi.

4.303.1.4.2 Lavatory Faucets in Common and Public Use Areas. The maximum flow rate of lavatory faucets installed in common and public use areas (outside of dwellings or sleeping units) in residential buildings shall not exceed 0.5 gallons per minute at 60 psi.

4.303.1.4.3 Metering Faucets. Metering faucets when installed in residential buildings shall not deliver more than 0.2 gallons per cycle.

4.303.1.4.4 Kitchen Faucets. The maximum flow rate of kitchen faucets shall not exceed 1.8 gallons per minute at 60 psi. Kitchen faucets may temporarily increase the flow above the maximum rate, but not to exceed 2.2 gallons per minute at 60 psi, and must default to a maximum flow rate of 1.8 gallons per minute at 60 psi.

Note: Where complying faucets are unavailable, aerators or other means may be used to achieve reduction.

4.303.1.4.5 Pre-rinse spray valves.
When installed, shall meet the requirements in the *California Code of Regulations*, Title 20 (Appliance Efficiency Regulations), Sections 1605.1 (h)(4) Table H-2, Section 1605.3 (h)(4)(A), and Section 1607 (d)(7) and shall be equipped with an integral automatic shutoff.

FOR REFERENCE ONLY: The following table and code section have been reprinted from the *California Code of Regulations*, Title 20 (Appliance Efficiency Regulations),Section 1605.1 (h)(4) and Section 1605.3 (h)(4)(A).

TABLE H-2

STANDARDS FOR COMMERCIAL PRE-RINSE SPRAY VALUES MANUFACTURED ON OR AFTER JANUARY 28, 2019

PRODUCT CLASS [spray force in ounce force (ozf)]	MAXIMUM FLOW RATE (gpm)
Product Class 1 (≤ 5.0 ozf)	1.00
Product Class 2 (> 5.0 ozf and ≤ 8.0 ozf)	1.20
Product Class 3 (> 8.0 ozf)	1.28

Title 20 Section 1605.3 (h)(4)(A): Commercial prerinse spray values manufactured on or after January 1, 2006, shall have a minimum spray force of not less than 4.0 ounces-force (ozf)[113 grams-force(gf)]

4.303.2 Submeters for multifamily buildings and dwelling units in mixed-used residential/commercial buildings.
Submeters shall be installed to measure water usage of individual rental dwelling units in accordance with the *California Plumbing Code*.

4.303.3 Standards for plumbing fixtures and fittings. Plumbing fixtures and fittings shall be installed in accordance with the *California Plumbing Code*, and shall meet the applicable standards referenced in Table 1701.1 of the *California Plumbing Code*.

NOTE:
THIS TABLE COMPILES THE DATA IN SECTION 4.303.1, AND IS INCLUDED AS A CONVENIENCE FOR THE USER.

TABLE - MAXIMUM FIXTURE WATER USE

FIXTURE TYPE	FLOW RATE
SHOWER HEADS (RESIDENTIAL)	1.8 GMP @ 80 PSI
LAVATORY FAUCETS (RESIDENTIAL)	MAX. 1.2 GPM @ 60 PSI MIN. 0.8 GPM @ 20 PSI
LAVATORY FAUCETS IN COMMON & PUBLIC USE AREAS	0.5 GPM @ 60 PSI
KITCHEN FAUCETS	1.8 GPM @ 60 PSI
METERING FAUCETS	0.2 GAL/CYCLE
WATER CLOSET	1.28 GAL/FLUSH
URINALS	0.125 GAL/FLUSH

4.304 OUTDOOR WATER USE
4.304.1 OUTDOOR POTABLE WATER USE IN LANDSCAPE AREAS. Residential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent.

NOTES:

1. The Model Water Efficient Landscape Ordinance (MWELO) is located in the *California Code Regulations*, Title 23, Chapter 2.7, Division 2. MWELO and supporting documents, including water budget calculator, are available at: https://www.water.ca.gov/

DIVISION 4.4 MATERIAL CONSERVATION AND RESOURCE EFFICIENCY

4.406 ENHANCED DURABILITY AND REDUCED MAINTENANCE
4.406.1 RODENT PROOFING. Annular spaces around pipes, electric cables, conduits or other openings in sole/bottom plates at exterior walls shall be protected against the passage of rodents by closing such openings with cement mortar, concrete masonry or a similar method acceptable to the enforcing agency.

4.408 CONSTRUCTION WASTE REDUCTION, DISPOSAL AND RECYCLING
4.408.1 CONSTRUCTION WASTE MANAGEMENT. Recycle and/or salvage for reuse a minimum of 65 percent of the non-hazardous construction and demolition waste in accordance with either Section 4.408.2, 4.408.3 or 4.408.4, or meet a more stringent local construction and demolition waste management ordinance.

Exceptions:

1. Excavated soil and land-clearing debris.
2. Alternate waste reduction methods developed by working with local agencies if diversion or recycle facilities capable of compliance with this item do not exist or are not located reasonably close to the jobsite.
3. The enforcing agency may make exceptions to the requirements of this section when isolated jobsites are located in areas beyond the haul boundaries of the diversion facility.

4.408.2 CONSTRUCTION WASTE MANAGEMENT PLAN. Submit a construction waste management plan in conformance with Items 1 through 5. The construction waste management plan shall be updated as necessary and shall be available during construction for examination by the enforcing agency.

1. Identify the construction and demolition waste materials to be diverted from disposal by recycling, reuse on the project or salvage for future use or sale.
2. Specify if construction and demolition waste materials will be sorted on-site (source separated) or bulk mixed (single stream).
3. Identify diversion facilities where the construction and demolition waste material collected will be taken.
4. Identify construction methods employed to reduce the amount of construction and demolition waste generated.
5. Specify that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, but not by both.

4.408.3 WASTE MANAGEMENT COMPANY. Utilize a waste management company, approved by the enforcing agency, which can provide verifiable documentation that the percentage of construction and demolition waste material diverted from the landfill complies with Section 4.408.1.

Note: The owner or contractor may make the determination if the construction and demolition waste materials will be diverted by a waste management company.

4.408.4 WASTE STREAM REDUCTION ALTERNATIVE [LR]. Projects that generate a total combined weight of construction and demolition waste disposed of in landfills, which do not exceed 3.4 lbs./sq.ft. of the building area shall meet the minimum 65% construction waste reduction requirement in Section 4.408.1

4.408.4.1 WASTE STREAM REDUCTION ALTERNATIVE. Projects that generate a total combined weight of construction and demolition waste disposed of in landfills, which do not exceed 2 pounds per square foot of the building area, shall meet the minimum 65% construction waste reduction requirement in Section 4.408.1

4.408.5 DOCUMENTATION. Documentation shall be provided to the enforcing agency which demonstrates compliance with Section 4.408.2, items 1 through 5, Section 4.408.3 or Section 4.408.4..

Notes:

1. Sample forms found in "A Guide to the California Green Building Standards Code (Residential)" located at www.hcd.ca.gov/CALGreen.html may be used to assist in documenting compliance with this section.
2. Mixed construction and demolition debris (C & D) processors can be located at the California Department of Resources Recycling and Recovery (CalRecycle).

4.410 BUILDING MAINTENANCE AND OPERATION
4.410.1 OPERATION AND MAINTENANCE MANUAL. At the time of final inspection, a manual, compact disc, web-based reference or other media acceptable to the enforcing agency which includes all of the following shall be placed in the building:

1. Directions to the owner or occupant that the manual shall remain with the building throughout the life cycle of the structure.
2. Operation and maintenance instructions for the following:
   a. Equipment and appliances, including water-saving devices and systems, HVAC systems, photovoltaic systems, electric vehicle chargers, water-heating systems and other major appliances and equipment.
   b. Roof and yard drainage, including gutters and downspouts.
   c. Space conditioning systems, including condensers and air filters.
   d. Landscape irrigation systems.
   e. Water reuse systems.
3. Information from local utility, water and waste recovery providers on methods to further reduce resource consumption, including recycle programs and locations.
4. Public transportation and/or carpool options available in the area.
5. Educational material on the positive impacts of an interior relative humidity between 30-60 percent and what methods an occupant may use to maintain the relative humidity level in that range.
6. Information about water-conserving landscape and irrigation design and controllers which conserve water.
7. Instructions for maintaining gutters and downspouts and the importance of diverting water at least 5 feet away from the foundation.
8. Information on required routine maintenance measures, including, but not limited to, caulking, painting, grading around the building, etc.
9. Information about state solar energy and incentive programs available.
10. A copy of all special inspections verifications required by the enforcing agency or this code.
11. Information from the Department of Forestry and Fire Protection on maintenance of defensible space around residential structures.
12. Information and/or drawings identifying the location of grab bar reinforcements.

4.410.2 RECYCLING BY OCCUPANTS. Where 5 or more multifamily dwelling units are constructed on a building site, provide readily accessible area(s) that serves all buildings on the site and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waster, and metals, or meet a lawfully enacted local recycling ordinance, if more restrictive.

Exception: Rural jurisdictions that meet and apply for the exemption in Public Resources Code Section 42649.82 (a)(2)(A) et seq. are note required to comply with the organic waste portion of this section.

DIVISION 4.5 ENVIRONMENTAL QUALITY

SECTION 4.501 GENERAL
4.501.1 Scope
The provisions of this chapter shall outline means of reducing the quality of air contaminants that are odorous, irritating and/or harmful to the comfort and well being of a building's installers, occupants and neighbors.

SECTION 4.502 DEFINITIONS
5.102.1 DEFINITIONS
The following terms are defined in Chapter 2 *(and are included here for reference)*

AGRIFIBER PRODUCTS. Agrifiber products include wheatboard, strawboard, panel substrates and door cores, not including furniture, fixtures and equipment (FF&E) not considered base building elements.

COMPOSITE WOOD PRODUCTS. Composite wood products include hardwood plywood, particleboard and medium density fiberboard. "Composite wood products" does not include hardboard, structural plywood, structural panels, structural composite lumber, oriented strand board, glued laminated timber, prefabricated wood I-joists or finger-jointed lumber, all as specified in California Code of regulations (CCR), title 17, Section 93120.1.

DIRECT-VENT APPLIANCE. A fuel-burning appliance with a sealed combustion system that draws all air for combustion from the outside atmosphere and discharges all flue gases to the outside atmosphere.

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Exhibit D

3500 PAUL SWEET ROAD

3500 PAUL SWEET ROAD
SANTA CRUZ, CA 95065

LICENSED ARCHITECT – STATE OF CALIFORNIA
NOT FOR CONSTRUCTION

NOT FOR CONSTRUCTION

ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
0	DRG SUBMITTAL	01.20.24
1	SB330	03.19.24
2	SB330 - 6 STORY	04.18.24
3	PLANNING SUBMITTAL	06.06.24
4	PLANNING SUBMITTAL	09.16.24

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	Author
Checked by	Checker
Scale	NTS

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CALGREEN MANDATORY CHECKLIST
GP0.10

AIA California

2022 CALIFORNIA GREEN BUILDING STANDARDS CODE
RESIDENTIAL MANDATORY MEASURES, SHEET 2 (January 2023)

Y = YES
N/A = NOT APPLICABLE
RESPON. PARTY = RESPONSIBLE PARTY (ie: ARCHITECT, ENGINEER, OWNER, CONTRACTOR, INSPECTOR ETC.)

MAXIMUM INCREMENTAL REACTIVITY (MIR). The maximum change in weight of ozone formed by adding a compound to the "Base Reactive Organic Gas (ROG) Mixture" per weight of compound added, expressed to hundredths of a gram (g O^3/g ROC).
Note: MIR values for individual compounds and hydrocarbon solvents are specified in CCR, Title 17, Sections 94700 and 94701.

MOISTURE CONTENT. The weight of the water in wood expressed in percentage of the weight of the oven-dry wood.

PRODUCT-WEIGHTED MIR (PWMIR). The sum of all weighted-MIR for all ingredients in a product subject to this article. The PWMIR is the total product reactivity expressed to hundredths of a gram of ozone formed per gram of product (excluding container and packaging).
Note: PWMIR is calculated according to equations found in CCR, Title 17, Section 94521 (a).

REACTIVE ORGANIC COMPOUND (ROC). Any compound that has the potential, once emitted, to contribute to ozone formation in the troposphere.

VOC. A volatile organic compound (VOC) broadly defined as a chemical compound based on carbon chains or rings with vapor pressures greater than 0.1 millimeters of mercury at room temperature. These compounds typically contain hydrogen and may contain oxygen, nitrogen and other elements. See CCR Title 17, Section 94508(a).

4.503 FIREPLACES
4.503.1 GENERAL. Any installed gas fireplace shall be a direct-vent sealed-combustion type. Any installed woodstove or pellet stove shall comply with U.S. EPA New Source Performance Standards (NSPS) emission limits as applicable, and shall have a permanent label indicating they are certified to meet the emission limits. Woodstoves, pellet stoves and fireplaces shall also comply with applicable local ordinances.

4.504 POLLUTANT CONTROL
4.504.1 COVERING OF DUCT OPENINGS & PROTECTION OF MECHANICAL EQUIPMENT DURING CONSTRUCTION. At the time of rough installation, during storage on the construction site and until final startup of the heating, cooling and ventilating equipment, all duct and other related air distribution component openings shall be covered with tape, plastic, sheet metal or other methods acceptable to the enforcing agency to reduce the amount of water, dust or debris which may enter the system.

4.504.2 FINISH MATERIAL POLLUTANT CONTROL. Finish materials shall comply with this section.

4.504.2.1 Adhesives, Sealants and Caulks. Adhesives, sealant and caulks used on the project shall meet the requirements of the following standards unless more stringent local or regional air pollution or air quality management district rules apply:

1. Adhesives, adhesive bonding primers, adhesive primers, sealants, sealant primers and caulks shall comply with local or regional air pollution control or air quality management district rules where applicable or SCAQMD Rule 1168 VOC limits, as shown in Table 4.504.1 or 4.504.2, as applicable. Such products also shall comply with the Rule 1168 prohibition on the use of certain toxic compounds (chloroform, ethylene dichloride, methylene chloride, perchloroethylene and tricloroethylene), except for aerosol products, as specified in Subsection 2 below.
2. Aerosol adhesives, and smaller unit sizes of adhesives, and sealant or caulking compounds (in units of product, less packaging, which do not weigh more than 1 pound and do not consist of more than 16 fluid ounces) shall comply with statewide VOC standards and other requirements, including prohibitions on use of certain toxic compounds, of *California Code of Regulations*, Title 17, commencing with section 94507.

4.504.2.2 Paints and Coatings. Architectural paints and coatings shall comply with VOC limits in Table 1 of the ARB Architectural Suggested Control Measure, as shown in Table 4.504.3, unless more stringent local limits apply. The VOC content limit for coatings that do not meet the definitions for the specialty coatings categories listed in Table 4.504.3 shall be determined by classifying the coating as a Flat, Nonflat or Nonflat-High Gloss coating, based on its gloss, as defined in subsections 4.21, 4.36, and 4.37 of the 2007 California Air Resources Board, Suggested Control Measure, and the corresponding Flat, Nonflat or Nonflat-High Gloss VOC limit in Table 4.504.3 shall apply.

4.504.2.3 Aerosol Paints and Coatings. Aerosol paints and coatings shall meet the Product-weighted MIR Limits for ROC in Section 94522(a)(2) and other requirements, including prohibitions on use of certain toxic compounds and ozone depleting substances, in Sections 94522(e)(1) and (f)(1) of *California Code of Regulations*, Title 17, commencing with Section 94520; and in areas under the jurisdiction of the Bay Area Air Quality Management District additionally comply with the percent VOC by weight of product limits of Regulation 8, Rule 49.

4.504.2.4 Verification. Verification of compliance with this section shall be provided at the request of the enforcing agency. Documentation may include, but is not limited to, the following:

1. Manufacturer's product specification.
2. Field verification of on-site product containers.

TABLE 4.504.1 - ADHESIVE VOC LIMIT 1,2

(Less Water and Less Exempt Compounds in Grams per Liter)

ARCHITECTURAL APPLICATIONS	VOC LIMIT
INDOOR CARPET ADHESIVES	50
CARPET PAD ADHESIVES	50
OUTDOOR CARPET ADHESIVES	150
WOOD FLOORING ADHESIVES	100
RUBBER FLOOR ADHESIVES	60
SUBFLOOR ADHESIVES	50
CERAMIC TILE ADHESIVES	65
VCT & ASPHALT TILE ADHESIVES	50
DRYWALL & PANEL ADHESIVES	50
COVE BASE ADHESIVES	50
MULTIPURPOSE CONSTRUCTION ADHESIVE	70
STRUCTURAL GLAZING ADHESIVES	100
SINGLE-PLY ROOF MEMBRANE ADHESIVES	250
OTHER ADHESIVES NOT LISTED	50
SPECIALTY APPLICATIONS	
PVC WELDING	510
CPVC WELDING	490
ABS WELDING	325
PLASTIC CEMENT WELDING	250
ADHESIVE PRIMER FOR PLASTIC	550
CONTACT ADHESIVE	80
SPECIAL PURPOSE CONTACT ADHESIVE	250
STRUCTURAL WOOD MEMBER ADHESIVE	140
TOP & TRIM ADHESIVE	250
SUBSTRATE SPECIFIC APPLICATIONS	
METAL TO METAL	30
PLASTIC FOAMS	50
POROUS MATERIAL (EXCEPT WOOD)	50
WOOD	30
FIBERGLASS	80

1. IF AN ADHESIVE IS USED TO BOND DISSIMILAR SUBSTRATES TOGETHER, THE ADHESIVE WITH THE HIGHEST VOC CONTENT SHALL BE ALLOWED.

2. FOR ADDITIONAL INFORMATION REGARDING METHODS TO MEASURE THE VOC CONTENT SPECIFIED IN THIS TABLE, SEE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT RULE 1168.

TABLE 4.504.2 - SEALANT VOC LIMIT

(Less Water and Less Exempt Compounds in Grams per Liter)

SEALANTS	VOC LIMIT
ARCHITECTURAL	250
MARINE DECK	760
NONMEMBRANE ROOF	300
ROADWAY	250
SINGLE-PLY ROOF MEMBRANE	450
OTHER	420
SEALANT PRIMERS	
ARCHITECTURAL	
NON-POROUS	250
POROUS	775
MODIFIED BITUMINOUS	500
MARINE DECK	760
OTHER	750

TABLE 4.504.3 - VOC CONTENT LIMITS FOR ARCHITECTURAL COATINGS 2,3

GRAMS OF VOC PER LITER OF COATING, LESS WATER & LESS EXEMPT COMPOUNDS

COATING CATEGORY	VOC LIMIT
FLAT COATINGS	50
NON-FLAT COATINGS	100
NONFLAT-HIGH GLOSS COATINGS	150
SPECIALTY COATINGS	
ALUMINUM ROOF COATINGS	400
BASEMENT SPECIALTY COATINGS	400
BITUMINOUS ROOF COATINGS	50
BITUMINOUS ROOF PRIMERS	350
BOND BREAKERS	350
CONCRETE CURING COMPOUNDS	350
CONCRETE/MASONRY SEALERS	100
DRIVEWAY SEALERS	50
DRY FOG COATINGS	150
FAUX FINISHING COATINGS	350
FIRE RESISTIVE COATINGS	350
FLOOR COATINGS	100
FORM-RELEASE COMPOUNDS	250
GRAPHIC ARTS COATINGS (SIGN PAINTS)	500
HIGH TEMPERATURE COATINGS	420
INDUSTRIAL MAINTENANCE COATINGS	250
LOW SOLIDS COATINGS1	120
MAGNESITE CEMENT COATINGS	450
MASTIC TEXTURE COATINGS	100
METALLIC PIGMENTED COATINGS	500
MULTICOLOR COATINGS	250
PRETREATMENT WASH PRIMERS	420
PRIMERS, SEALERS, & UNDERCOATERS	100
REACTIVE PENETRATING SEALERS	350
RECYCLED COATINGS	250
ROOF COATINGS	50
RUST PREVENTATIVE COATINGS	250
SHELLACS	
CLEAR	730
OPAQUE	550
SPECIALTY PRIMERS, SEALERS & UNDERCOATERS	100
STAINS	250
STONE CONSOLIDANTS	450
SWIMMING POOL COATINGS	340
TRAFFIC MARKING COATINGS	100
TUB & TILE REFINISH COATINGS	420
WATERPROOFING MEMBRANES	250
WOOD COATINGS	275
WOOD PRESERVATIVES	350
ZINC-RICH PRIMERS	340

1. GRAMS OF VOC PER LITER OF COATING, INCLUDING WATER & EXEMPT COMPOUNDS

2. THE SPECIFIED LIMITS REMAIN IN EFFECT UNLESS REVISED LIMITS ARE LISTED IN SUBSEQUENT COLUMNS IN THE TABLE.

3. VALUES IN THIS TABLE ARE DERIVED FROM THOSE SPECIFIED BY THE CALIFORNIA AIR RESOURCES BOARD, ARCHITECTURAL COATINGS SUGGESTED CONTROL MEASURE, FEB. 1, 2008. MORE INFORMATION IS AVAILABLE FROM THE AIR RESOURCES BOARD.

TABLE 4.504.5 - FORMALDEHYDE LIMITS 1

MAXIMUM FORMALDEHYDE EMISSIONS IN PARTS PER MILLION

PRODUCT	CURRENT LIMIT
HARDWOOD PLYWOOD VENEER CORE	0.05
HARDWOOD PLYWOOD COMPOSITE CORE	0.05
PARTICLE BOARD	0.09
MEDIUM DENSITY FIBERBOARD	0.11
THIN MEDIUM DENSITY FIBERBOARD2	0.13

1. VALUES IN THIS TABLE ARE DERIVED FROM THOSE SPECIFIED BY THE CALIF. AIR RESOURCES BOARD, AIR TOXICS CONTROL MEASURE FOR COMPOSITE WOOD AS TESTED IN ACCORDANCE WITH ASTM E 1333. FOR ADDITIONAL INFORMATION, SEE CALIF. CODE OF REGULATIONS, TITLE 17, SECTIONS 93120 THROUGH 93120.12.

2. THIN MEDIUM DENSITY FIBERBOARD HAS A MAXIMUM THICKNESS OF 5/16" (8 MM).

DIVISION 4.5 ENVIRONMENTAL QUALITY (continued)
4.504.3 CARPET SYSTEMS. All carpet installed in the building interior shall meet the requirements of the California Department of Public Health, "Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources Using Environmental Chambers," Version 1.2, January 2017 (Emission testing method for California Specification 01350)

See California Department of Public Health's website for certification programs and testing labs.

https://www.cdph.ca.gov/Programs/CCDPHP/DEODC/EHLB/IAQ/Pages/VOC.aspx.

4.504.3.1 Carpet cushion. All carpet cushion installed in the building interior shall meet the requirements of the California Department of Public Health, "Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources Using Environmental Chambers," Version 1.2, January 2017 (Emission testing method for California Specification 01350)

See California Department of Public Health's website for certification programs and testing labs.

https://www.cdph.ca.gov/Programs/CCDPHP/DEODC/EHLB/IAQ/Pages/VOC.aspx.

4.504.3.2 Carpet adhesive. All carpet adhesive shall meet the requirements of Table 4.504.1.

4.504.4 RESILIENT FLOORING SYSTEMS. Where resilient flooring is installed , at least 80% of floor area receiving resilient flooring shall meet the requirements of the California Department of Public Health, "Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources Using Environmental Chambers," Version 1.2, January 2017 (Emission testing method for California Specification 01350)

See California Department of Public Health's website for certification programs and testing labs.

https://www.cdph.ca.gov/Programs/CCDPHP/DEODC/EHLB/IAQ/Pages/VOC.aspx.

4.504.5 COMPOSITE WOOD PRODUCTS. Hardwood plywood, particleboard and medium density fiberboard composite wood products used on the interior or exterior of the buildings shall meet the requirements for formaldehyde as specified in ARB's Air Toxics Control Measure for Composite Wood (17 CCR 93120 et seq.), by or before the dates specified in those sections, as shown in Table 4.504.5

4.504.5.1 Documentation. Verification of compliance with this section shall be provided as requested by the enforcing agency. Documentation shall include at least one of the following:

1. Product certifications and specifications.
2. Chain of custody certifications.
3. Product labeled and invoiced as meeting the Composite Wood Products regulation (see CCR, Title 17, Section 93120, et seq.).
4. Exterior grade products marked as meeting the PS-1 or PS-2 standards of the Engineered Wood Association, the Australian AS/NZS 2269, European 636 3S standards, and Canadian CSA 0121, CSA 0151, CSA 0153 and CSA 0325 standards.
5. Other methods acceptable to the enforcing agency.

4.505 INTERIOR MOISTURE CONTROL
4.505.1 General. Buildings shall meet or exceed the provisions of the *California Building Standards Code*.

4.505.2 CONCRETE SLAB FOUNDATIONS. Concrete slab foundations required to have a vapor retarder by California Building Code, Chapter 19, or concrete slab-on-ground floors required to have a vapor retarder by the California Residential Code, Chapter 5, shall also comply with this section.

4.505.2.1 Capillary break. A capillary break shall be installed in compliance with at least one of the following:

1. A 4-inch (101.6 mm) thick base of 1/2 inch (12.7mm) or larger clean aggregate shall be provided with a vapor barrier in direct contact with concrete and a concrete mix design, which will address bleeding, shrinkage, and curling, shall be used. For additional information, see American Concrete Institute, ACI 302.2R-06.
2. Other equivalent methods approved by the enforcing agency.
3. A slab design specified by a licensed design professional.

4.505.3 MOISTURE CONTENT OF BUILDING MATERIALS. Building materials with visible signs of water damage shall not be installed. Wall and floor framing shall not be enclosed when the framing members exceed 19 percent moisture content. Moisture content shall be verified in compliance with the following:

1. Moisture content shall be determined with either a probe-type or contact-type moisture meter.Equivalent moisture verification methods may be approved by the enforcing agency and shall satisfy requirements found in Section 101.8 of this code.
2. Moisture readings shall be taken at a point 2 feet (610 mm) to 4 feet (1219 mm) from the grade stamped end of each piece verified.
3. At least three random moisture readings shall be performed on wall and floor framing with documentation acceptable to the enforcing agency provided at the time of approval to enclose the wall and floor framing.

Insulation products which are visibly wet or have a high moisture content shall be replaced or allowed to dry prior to enclosure in wall or floor cavities. Wet-applied insulation products shall follow the manufacturers' drying recommendations prior to enclosure.

4.506 INDOOR AIR QUALITY AND EXHAUST
4.506.1 Bathroom exhaust fans. Each bathroom shall be mechanically ventilated and shall comply with the following:

1. Fans shall be ENERGY STAR compliant and be ducted to terminate outside the building.
2. Unless functioning as a component of a whole house ventilation system, fans must be controlled by a humidity control.
   a. Humidity controls shall be capable of adjustment between a relative humidity range less than or equal to 50% to a maximum of 80%. A humidity control may utilize manual or automatic means of adjustment.
   b. A humidity control may be a separate component to the exhaust fan and is not required to be integral (i.e., built-in)

Notes:

1. For the purposes of this section, a bathroom is a room which contains a bathtub, shower or tub/shower combination.
2. Lighting integral to bathroom exhaust fans shall comply with the *California Energy Code*.

4.507 ENVIRONMENTAL COMFORT
4.507.2 HEATING AND AIR-CONDITIONING SYSTEM DESIGN. Heating and air conditioning systems shall be sized, designed and have their equipment selected using the following methods:

1. The heat loss and heat gain is established according to ANSI/ACCA 2 Manual J - 2011 (Residential Load Calculation), ASHRAE handbooks or other equivalent design software or methods.
2. Duct systems are sized according to ANSI/ACCA 1 Manual D - 2014 (Residential Duct Systems), ASHRAE handbooks or other equivalent design software or methods.
3. Select heating and cooling equipment according to ANSI/ACCA 3 Manual S - 2014 (Residential Equipment Selection), or other equivalent design software or methods.

Exception: Use of alternate design temperatures necessary to ensure the system functions are acceptable.

CHAPTER 7
INSTALLER & SPECIAL INSPECTOR QUALIFICATIONS
702 QUALIFICATIONS
702.1 INSTALLER TRAINING. HVAC system installers shall be trained and certified in the proper installation of HVAC systems including ducts and equipment by a nationally or regionally recognized training or certification program. Uncertified persons may perform HVAC installations when under the direct supervision and responsibility of a person trained and certified to install HVAC systems or contractor licensed to install HVAC systems. Examples of acceptable HVAC training and certification programs include but are not limited to the following:

1. State certified apprenticeship programs.
2. Public utility training programs.
3. Training programs sponsored by trade, labor or statewide energy consulting or verification organizations.
4. Programs sponsored by manufacturing organizations.
5. Other programs acceptable to the enforcing agency.

702.2 SPECIAL INSPECTION [HCD]. When required by the enforcing agency, the owner or the responsible entity acting as the owner's agent shall employ one or more special inspectors to provide inspection or other duties necessary to substantiate compliance with this code. Special inspectors shall demonstrate competence to the satisfaction of the enforcing agency for the particular type of inspection or task to be performed. In addition to other certifications or qualifications acceptable to the enforcing agency, the following certifications or education may be considered by the enforcing agency when evaluating the qualifications of a special inspector:

1. Certification by a national or regional green building program or standard publisher.
2. Certification by a statewide energy consulting or verification organization, such as HERS raters, building performance contractors, and home energy auditors.
3. Successful completion of a third party apprentice training program in the appropriate trade.
4. Other programs acceptable to the enforcing agency.

Notes:
1. Special inspectors shall be independent entities with no financial interest in the materials or the project they are inspecting for compliance with this code.
2. HERS raters are special inspectors certified by the California Energy Commission (CEC) to rate homes in California according to the Home Energy Rating System (HERS).

[BSC] When required by the enforcing agency, the owner or the responsible entity acting as the owner's agent shall employ one or more special inspectors to provide inspection or other duties necessary to substantiate compliance with this code. Special inspectors shall demonstrate competence to the satisfaction of the enforcing agency for the particular type of inspection or task to be performed. In addition, the special inspector shall have a certification from a recognized state, national or international association, as determined by the local agency. The area of certification shall be closely related to the primary job function, as determined by the local agency.

Note: Special inspectors shall be independent entities with no financial interest in the materials or the project they are inspecting for compliance with this code.

703 VERIFICATIONS
703.1 DOCUMENTATION. Documentation used to show compliance with this code shall include but is not limited to, construction documents, plans, specifications, builder or installer certification, inspection reports, or other methods acceptable to the enforcing agency which demonstrate substantial conformance. When specific documentation or special inspection is necessary to verify compliance, that method of compliance will be specified in the appropriate section or identified applicable checklist.

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Exhibit D

3500 PAUL SWEET ROAD

3500 PAUL SWEET ROAD
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LICENSED ARCHITECT STATE OF CALIFORNIA — NOT FOR CONSTRUCTION

NOT FOR CONSTRUCTION

ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
0	DRG SUBMITTAL	01.20.24
1	SB330	03.19.24
2	SB330 - 6 STORY	04.18.24
3	PLANNING SUBMITTAL	06.06.24
4	PLANNING SUBMITTAL	09.16.24

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	Author
Checked by	Checker
Scale	NTS

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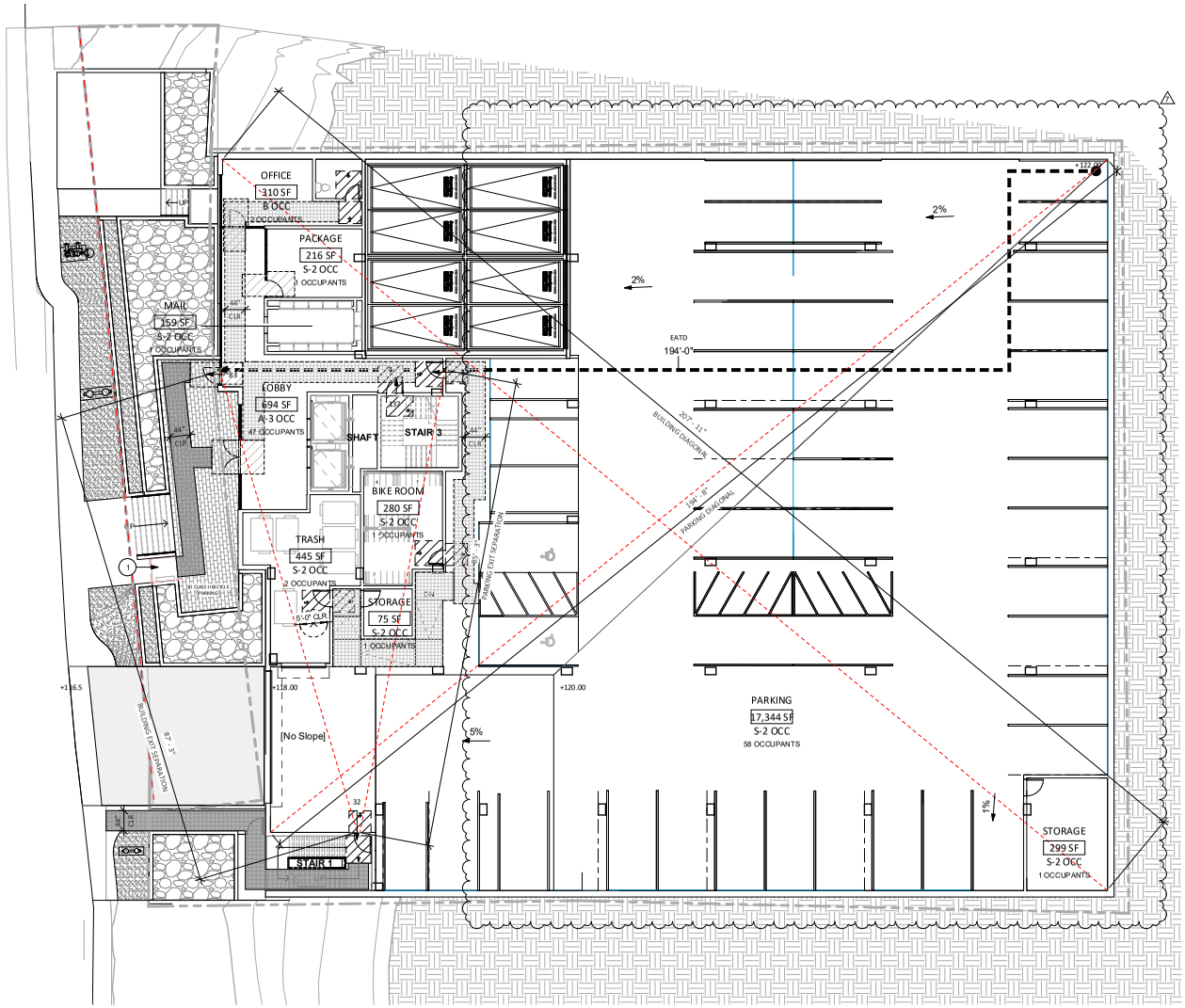
CALGREEN MANDATORY CHECKLIST

GP0.11



1 LEVEL 1.5 - CODE
1" = 10'-0"

CODE DIAGRAM GENERAL NOTES

1. INTERIOR NON-BEARING PARTITIONS ARE NOT REQUIRED TO BE RATED UNLESS OTHERWISE NOTED.
2. ALL CORRIDORS AT RESIDENTIAL LEVELS ARE GREATER THAN THE 44" WIDTH AS REQUIRED BY CBC
3. TWO WAY EMERGENCY COMMUNICATION NOT REQUIRED
4. A.O.R. NOT REQUIRED IN STAIRWELLS
5. NOTE THAT ALL SPACES WITH LESS THAN 50 OCCUPANTS REQUIRE ONE MEANS OF EGRESS. SPACES WITH MORE THAN 50 OCCUPANTS REQUIRE TWO MEANS OF EGRESS.
6. ALL 3'-0" WIDE DOORS (WHICH ARE TYPICAL) HAVE SUFFICIENT EGRESS WIDTH FOR 180 OCCUPANTS.
7. CBC 11A APPLIES TO RESIDENCES AND MOST COMMON AREAS
8. CBC 11B APPLIES TO RENTAL OFFICE AND POT TO RENTAL OFFICE

CODE COMPLIANCE SYMBOLS

EXTERIOR ACCESSIBLE MEANS OF RGRESS PATH TO ROW
EXTERIOR EGRESS PATH TO ROW (PROVIDE MINIMUM ILLUMINATION FOR EXITING).

ACCESSIBLE MEANS OF EGRESS (PROVIDE MINIMUM ILLUMINATION FOR EXITING).

EXIT ACCESS TRAVEL DISTANCE (EATD)

EXIT SEPARATION OR DIAGONAL

NUMBER OF OCCUPANTS PER EXIT

OCCPANCY LOAD CALCULATIONS

PER CBC TABLE 1006.2.1 & CBC TABLE 1004.5.

LEVEL1:

A-3 OCC:	692 SF/15 =	47 OCCUPANTS
B OCC :	310 SF/150 SF =	2 OCCPANTS
S-2 OCC:	18,810 SF/300 =	64 OCCUPANTS
OCCUPANT LOAD:		113 = 2 EXITS REQUIRED

LEVEL 2:

R-2 OCC:	10,657 SF/200 =	53 OCCUPANTS
S-2 OCC:	491 SF/300 =	2 OCCPANTS
A-3 OCC:	3,276 SF/15 =	219 OCCUPANTS
OCCUPANT LOAD:		274 = 2 EXITS REQUIRED

LEVEL 2 TERRACE :

A-3 OCC:	3,276 SF/15 =	219 OCCUPANTS 2 EXITS REQUIRED

LEVELS 3-6:

R-2 OCC:	10,656 SF/200 =	53 OCCUPANTS
S-2 OCC:	491 SF/300 =	2 OCCUPANTS
OCCUPANT LOAD:		55 = 2 EXITS REQUIRED

EXIT SEPARATION DISTANCE REQUIREMENT PER CBC SECTION 1007.1.1, EXCEPTION 2. NOT LESS THAN ONE THIRD OF THE LENGTH OF THE MAXIMUM OVERALL DIAGONAL DIMENSION OF THE AREA SERVED.

TRAVEL PATH DISTANCES PER CBC TABLE 1017.2

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LICENSED ARCHITECT JAY CALIFORNIA
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ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
7	PLANNING REVISION	05.15.25

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	Author
Checked by	Checker
Scale	As indicated

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EGRESS & ACCESSIBLITY LEVEL 1

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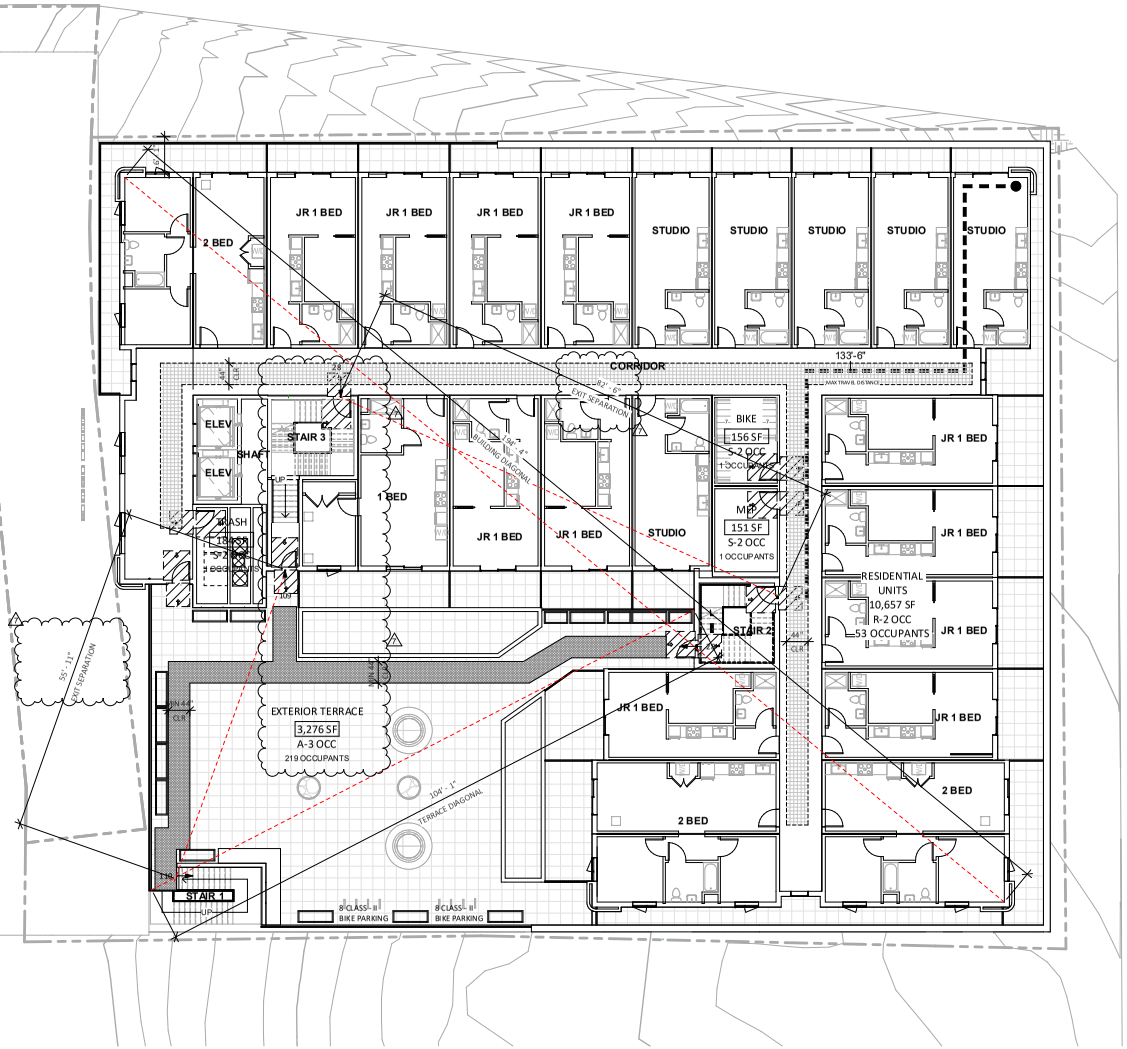

1 LEVEL 2 - CODE
1" = 10'-0"

CODE DIAGRAM GENERAL NOTES

1. INTERIOR NON-BEARING PARTITIONS ARE NOT REQUIRED TO BE RATED UNLESS OTHERWISE NOTED.
2. ALL CORRIDORS AT RESIDENTIAL LEVELS ARE GREATER THAN THE 44" WIDTH AS REQUIRED BY CBC
3. TWO WAY EMERGENCY COMMUNICATION NOT REQUIRED
4. A.O.R. NOT REQUIRED IN STAIRWELLS
5. NOTE THAT ALL SPACES WITH LESS THAN 50 OCCUPANTS REQUIRE ONE MEANS OF EGRESS. SPACES WITH MORE THAN 50 OCCUPANTS REQUIRE TWO MEANS OF EGRESS.
6. ALL 3'-0" WIDE DOORS (WHICH ARE TYPICAL) HAVE SUFFICIENT EGRESS WIDTH FOR 180 OCCUPANTS.
7. CBC 11A APPLIES TO RESIDENCES AND MOST COMMON AREAS
8. CBC 11B APPLIES TO RENTAL OFFICE AND POT TO RENTAL OFFICE

CODE COMPLIANCE SYMBOLS

EXTERIOR ACCESSIBLE MEANS OF RGRESS PATH TO ROW
EXTERIOR EGRESS PATH TO ROW (PROVIDE MINIMUM ILLUMINATION FOR EXITING).

ACCESSIBLE MEANS OF EGRESS (PROVIDE MINIMUM ILLUMINATION FOR EXITING).

EXIT ACCESS TRAVEL DISTANCE (EATD)

EXIT SEPARATION OR DIAGONAL

NUMBER OF OCCUPANTS PER EXIT

OCCPANCY LOAD CALCULATIONS

PER CBC TABLE 1006.2.1 & CBC TABLE 1004.5.

LEVEL1:

A-3 OCC:	692 SF/15 =	47 OCCUPANTS
B OCC :	310 SF/150 SF =	2 OCCPANTS
S-2 OCC:	18,810 SF/300 =	64 OCCUPANTS
OCCUPANT LOAD:		113 = 2 EXITS REQUIRED

LEVEL 2:

R-2 OCC:	10,657 SF/200 =	53 OCCUPANTS
S-2 OCC:	491 SF/300 =	2 OCCUPANTS
A-3 OCC:	3,276 SF/15 =	219 OCCUPANTS
OCCUPANT LOAD:		274 = 2 EXITS REQUIRED

LEVEL 2 TERRACE :

A-3 OCC:	3,276 SF/15 =	219 OCCUPANTS 2 EXITS REQUIRED

LEVELS 3-6:

R-2 OCC:	10,656 SF/200 =	53 OCCUPANTS
S-2 OCC:	491 SF/300 =	2 OCCUPANTS
OCCUPANT LOAD:		55 = 2 EXITS REQUIRED

EXIT SEPARATION DISTANCE REQUIREMENT PER CBC SECTION 1007.1.1, EXCEPTION 2. NOT LESS THAN ONE THIRD OF THE LENGTH OF THE MAXIMUM OVERALL DIAGONAL DIMENSION OF THE AREA SERVED.

TRAVEL PATH DISTANCES PER CBC TABLE 1017.2

workbench
189 WALNUT AVENUE
SANTA CRUZ, CA 95060
WORKBENCHBUILT.COM
P: 831.227.2217

Exhibit D

3500 PAUL SWEET ROAD

3500 PAUL SWEET ROAD
SANTA CRUZ, CA 95065

LICENSED ARCHITECT JAY CALIFORNIA
NOT FOR CONSTRUCTION
NOT FOR CONSTRUCTION

ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
6	PLANNING REVISION	03.04.25
7	PLANNING REVISION	05.15.25

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	Author
Checked by	Checker
Scale	As indicated

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EGRESS & ACCESSIBLITY LEVEL 2

GP0.13

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1 LEVEL 3-6 CODE
1" = 10'-0"

CODE DIAGRAM GENERAL NOTES

1. INTERIOR NON-BEARING PARTITIONS ARE NOT REQUIRED TO BE RATED UNLESS OTHERWISE NOTED.
2. ALL CORRIDORS AT RESIDENTIAL LEVELS ARE GREATER THAN THE 44" WIDTH AS REQUIRED BY CBC
3. TWO WAY EMERGENCY COMMUNICATION NOT REQUIRED
4. A.O.R. NOT REQUIRED IN STAIRWELLS
5. NOTE THAT ALL SPACES WITH LESS THAN 50 OCCUPANTS REQUIRE ONE MEANS OF EGRESS. SPACES WITH MORE THAN 50 OCCUPANTS REQUIRE TWO MEANS OF EGRESS.
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3500 PAUL SWEET ROAD

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SANTA CRUZ, CA 95065

LICENSED AF ARCHITECT JAY CALIFORNIA
NOT FOR CONSTRUCTION
NOT FOR CONSTRUCTION

ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
6	PLANNING REVISION	03.04.25
7	PLANNING REVISION	05.15.25

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	Author
Checked by	Checker
Scale	As indicated

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EGRESS & ACCESSIBLITY LEVELS 3-6
GP0.14

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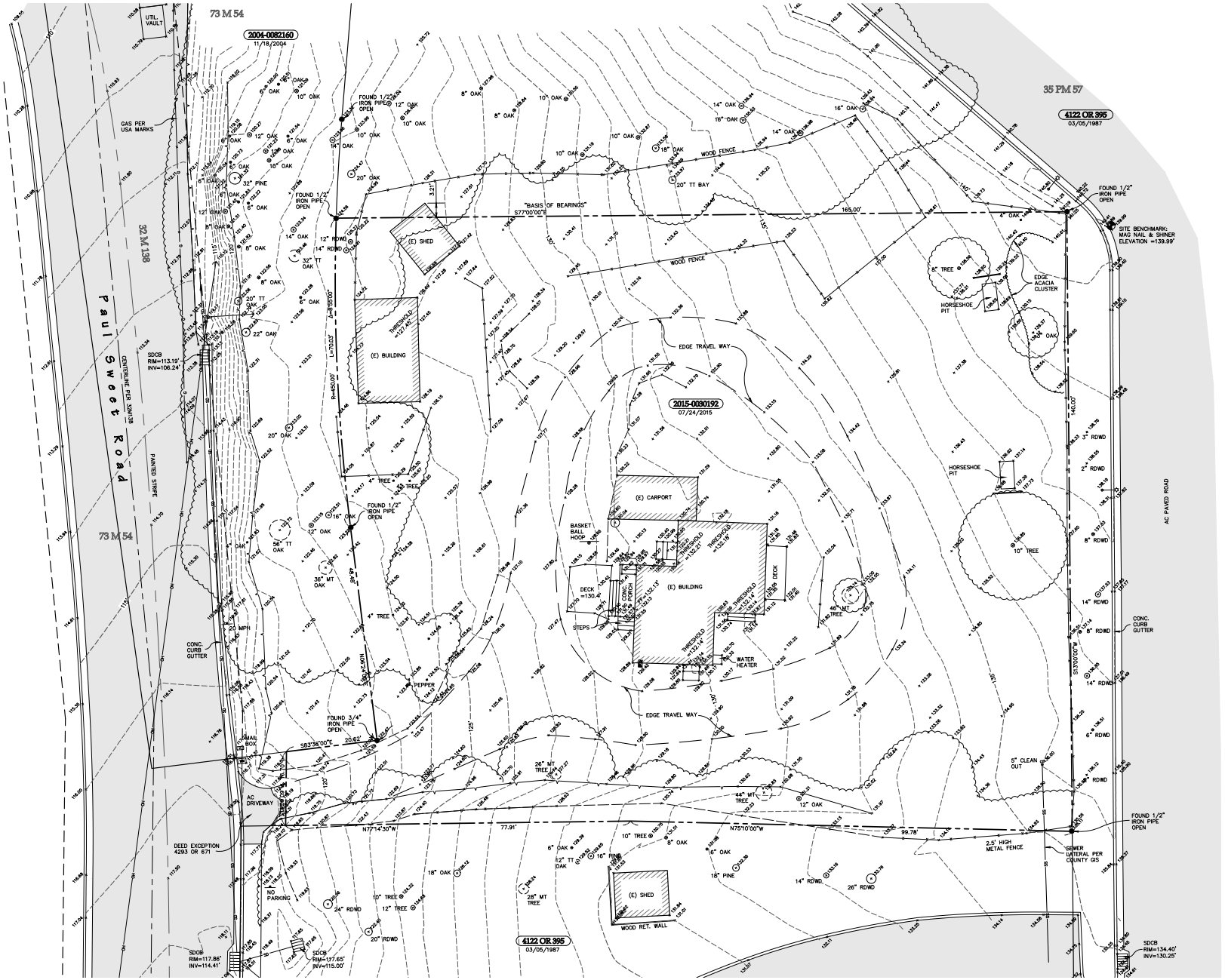


Legend

- MONUMENT FOUND AS NOTED
- BENCHMARK
- INV. INVERT ELEVATION
- GAS METER
- ELECTROLIER
- STORM DRAIN INLET
- SURVEY CONTROL POINT
- STREET SIGNAGE
- CLEANOUT
- UTILITY POLE
- GUY WIRE
- BUILDING FOOTPRINT
- ASPHALT CONCRETE, AC (SHADED)
- GRADE BREAK
- OVERHEAD UTILITY LINE
- GAS LINE USA LOCATED
- SANITARY SEWER LINE GIS DATA
- STORM DRAIN LINE FIELD DATA
- FENCE
- PROPERTY BOUNDARY
- CONTOUR LINE
- TOE OF SLOPE
- TOP OF SLOPE
- TREE DRIPLINE
- BRUSH / HEDGE LINE
- FLOWLINE

ALL DISTANCES SHOWN ARE IN FEET AND DECIMALS THEREOF.

Basis of Bearings

THE BASIS OF BEARINGS FOR THIS SURVEY IS BETWEEN MONUMENTS FOUND ALONG THE NORTHERLY PROPERTY LINE, AS CALLED OUT IN THAT CERTAIN TRUST TRANSFER DEED, DOCUMENT NO. 2015-0030192, DATED JULY 24TH, 2015, SANTA CRUZ COUNTY RECORDS.

BASIS OF BEARINGS = S 77°00' E

Benchmark

THE ELEVATIONS SHOWN ON THIS SURVEY ARE BASED ON NAVD88 DATUM DERIVED FROM GPS OBSERVATIONS AND COMPUTED USING GEOID12B. FROM TIES TO HPGN CA 04--AJ.

HPGN CA 04--AJ ELEVATION = 104.00' (NAVD88)

SITE BENCHMARK:
MAG NAIL AND SHINER SET IN ASPHALT OF DOMINICAN HOSPITAL PARKING LOT ADJACENT TO THE NORTHEASTERLY PROPERTY CORNER.

IFLAND SURVEY
Surveying - Mapping - GPS
5300 Soquel Avenue, Suite 101, Santa Cruz, CA 95062
Tel 831.426.7941 Fax 831.426.7942

REVISIONS

Exhibit D

Boundary and Topographic Survey for:
3500 Paul Sweet Road 72
Santa Cruz, CA 95065

PREPARED AT THE REQUEST OF:
IFLAND ENGINEERS

DATE 01/14/19
SCALE 1"=10'
DRAWN VCL

SHEET 1 OF 1 SHEETS

JOB NO. G18044

IMPROVEMENT PLANS

FOR

PAUL SWEET ROAD

3500 PAUL SWEET ROAD

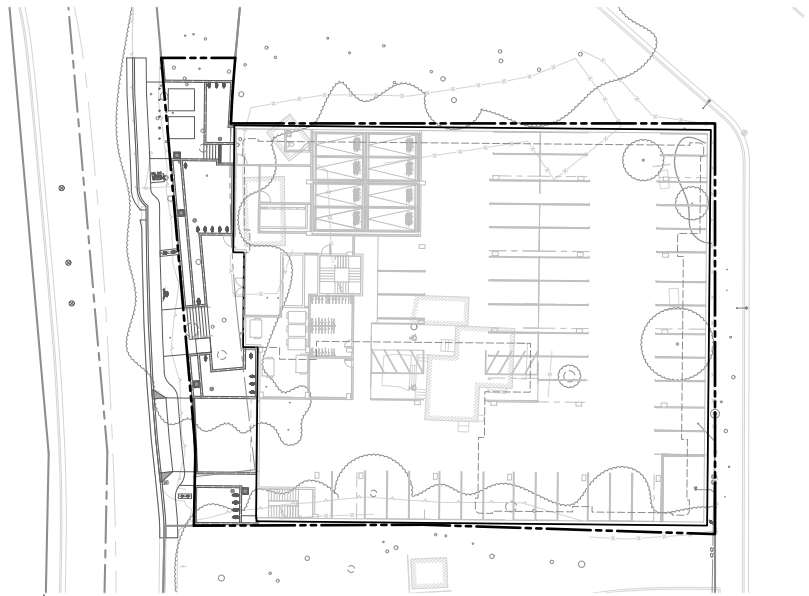
SANTA CRUZ, CALIFORNIA

ABBREVIATIONS

AB	AGGREGATE BASE	JB	JUNCTION BOX
AGG	AGGREGATE	JT	JOINT TRENCH
ARV	AIR-RELEASE VALVE	LF	LINEAR FOOT
BFP	BACKFLOW PREVENTER	LIP	LIP OF GUTTER
BO	BLOW-OFF VALVE	LOG	LIMIT OF GRADING
BRW	FINISH GRADE BELOW WALL	LP	LOW POINT
BSW	BACK OF SIDEWALK	MFS	MECHANICAL FILTRATION SYSTEM
BVC	BEGIN VERTICAL CURVE	MH	MANHOLE
BW	BOTTOM OF WALL	N	NORTH
CATV	CABLE TELEVISION	NE	NORTHEAST
CC	CURB CUT	NW	NORTHWEST
CB	CATCH BASIN	OCS	OUTLET CONTROL STRUCTURE
CI	CURB INLET	OH	OVERHEAD
CIP	CAST IRON PIPE	PCC	PORTLAND CEMENT CONCRETE
CL	CENTERLINE	PE	POLYETHYLENE
CMP	CORRUGATED METAL PIPE	PP	POWER POLE
CMU	CONCRETE MASONRY UNIT	PL	PROPERTY LINE
CO	CLEANOUT	PRC	POINT OF REVERSE CURVE
COMM	COMMERCIAL	PIV	POST-INDICATOR VALVE
CONC	CONCRETE	PV	PAVEMENT
COTG	CLEANOUT TO GRADE	PVC	POLYVINYL CHLORIDE PIPE
DIP	DUCTILE IRON PIPE	R	RADIUS
DOM	DOMESTIC	RD	ROOF DRAIN, ROAD
DTL	DETAIL	R.C.	RELATIVE COMPACTION
DW	DOMESTIC WATER	RCP	REINFORCED CONCRETE PIPE
DWG	DRAWING	ROW	RIGHT-OF-WAY
DWY	DRIVEWAY	RPPB	REDUCE PRESSURE PRINCIPLE BACKFLOW
E	EAST, ELECTRICAL	RW	RECYCLED WATER
EG	EXISTING GROUND	S	SOUTH, SLOPE
EP	EDGE OF PAVEMENT	SD	STORM DRAIN
(E)	EXISTING	SE	SOUTHEAST
EX.	EXISTING	SCC	SANTA CRUZ COUNTY
FC	FACE OF CURB	SCWD	SANTA CRUZ CITY WATER DEPARTMENT
FDC	FIRE DEPARTMENT CONNECTION	SDMH	STORM DRAIN MANHOLE
FG	FINISH GRADE	SS	SANITARY SEWER
FF	FINISH FLOOR	SSMH	SANITARY SEWER MANHOLE
FH	FIRE HYDRANT	STA	STATION
FL	FLOWLINE	STD	STANDARD
FNC	FENCE	SW	SIDEWALK, SOUTHWEST
FO	FIBER OPTIC	T	TELEPHONE
FT	FOOT/FEET	TD	TRENCH DRAIN
FW	FIRE WATER	TC	TOP OF CURB
G	GAS	TRAN	TRANSFORMER
GB	GRADE BREAK	TRW	FINISH GRADE ABOVE WALL
HT	HEIGHT	TW	TOP OF WALL
HDPE	HIGH-DENSITY POLYETHYLENE	USA	UNDERGROUND SERVICE ALERT
HP	HIGH POINT	VG	VALLEY GUTTER
INT	INTERSECTION	W	WEST, WATER
INV	INVERT	WM	WATER METER
IRR	IRRIGATION	WV	WATER VALVE

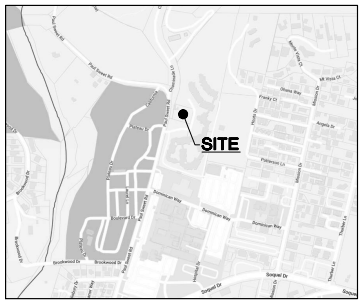
LEGEND

DESCRIPTION	PROPOSED
AIR RELEASE VALVE	
AREA DRAIN	
BLOW-OFF VALVE	
CATCH BASIN	
CURB INLET	
CLEANOUT STRUCTURE	
FIRE HYDRANT	
GUY ANCHOR	
MANHOLE STRUCTURE	
WATER THRUST BLOCK	
WATER METER	
WATER VALVE	
COMMUNICATION LINE	COMM
ELECTRICAL LINE	E
FIBER OPTIC LINE	FO
FIRE WATER LINE	FW
GAS LINE	G
IRRIGATION LINE	IRR
JOINT TRENCH LINE	JT
OVERHEAD LINE	OH
RECYCLED WATER LINE	RW
STORM DRAIN LINE	SD
SANITARY SEWER LINE	SS
TELEPHONE LINE	T
CABLE TV LINE	TV
WATER LINE	W



PLAN VIEW

N.T.S.



MAP DATA © GOOGLE

VICINITY MAP

N.T.S.

NOT FOR CONSTRUCTION

GEOTECHNICAL ENGINEER

GEOTECHNICAL INVESTIGATIVE REPORT FOR THIS PROJECT WAS OBTAINED FROM ROCK SOLID ENGINEERING, INC., PROJECT NO. 23016, DATED MAY 2, 2023.

SURVEY

SURVEY FOR THIS PROJECT WAS OBTAINED FROM IFLAND SURVEY, PROJECT NO, G18044, DATED JANUARY 1, 2019

BENCHMARK

BENCHMARK FOR THIS SURVEY IS A MAG NAIL AND SHINER SET IN ASPHALT OF DOMINICAN HOSPITAL PARKING LOT ADJACENT TO THE NORTHEASTERLY PROPERTY CORNER.

ELEVATION= 104.00 FEET DATUM: NAVD88

BASIS OF BEARINGS

BASIS OF BEARINGS FOR THIS SURVEY IS BETWEEN MONUMENTS FOUND ALONG THE NORTHERLY PROPERTY LINE, AS CALLED OUT IN THAT CERTAIN TRUST TRANSFER DEED, DOCUMENT NO. 2015-0030192, DATED JULY 24TH, 2015, SANTA CRUZ COUNTY RECORDS.

BEARING= S 77°00' E

INDEX OF CIVIL SHEETS

SHEET NO.	DESCRIPTION
C0.0	COVER SHEET
C1.0	PRELIMINARY GRADING AND DRAINAGE PLAN
C1.1	PRELIMINARY GRADING SECTIONS
C2.0	PRELIMINARY UTILITY PLAN
C3.0	PRELIMINARY STORMWATER CONTROL PLAN
C3.1	PRELIMINARY STORMWATER CONTROL DETAILS
C4.0	PRELIMINARY EROSION CONTROL DETAILS
C4.1	PRELIMINARY EROSION CONTROL PLAN

CALL BEFORE YOU DIG 811 USA

PRELIMINARY

COVER SHEET

PAUL SWEET ROAD

3500 PAUL SWEET ROAD, SANTA CRUZ, CALIFORNIA

APN 025-013-37

DESIGN DEVELOPMENT

DATE 05/17/24 | DESIGN DD | DRAWN DD

SHEET C0.0

JOB NO. 23026

BY	REVISION	DATE
DD	1 PLAN REVIEW COMMENT RESPONSE	6/14/2024
DD	0 PLAN REVIEW COMMENT RESPONSE	7/10/2024

Exhibit D

IFLAND ENGINEERS

CIVIL ENGINEERING ■ LAND PLANNING ■ STRUCTURAL DESIGN

5900 BEARDSLEY AVE., SUITE A2
SANTA ROSA, CA 95409
PH: (707) 539-5828
www.ifland.com

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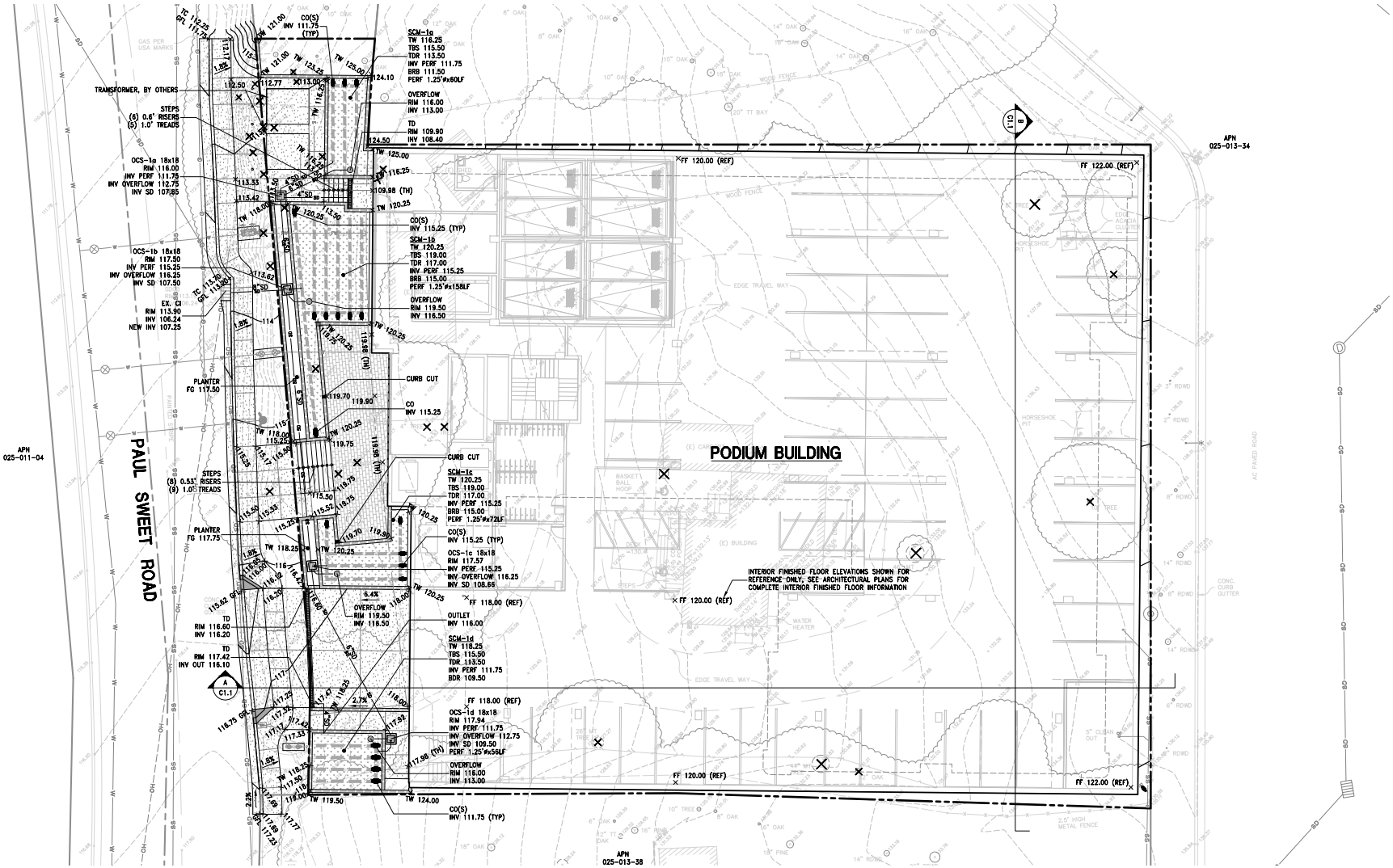

NOT FOR CONSTRUCTION

PRELIMINARY

GRADING AND DRAINAGE PLAN

PAUL SWEET ROAD

3500 PAUL SWEET ROAD, SANTA CRUZ, CALIFORNIA

ESTIMATED EARTHWORK QUANTITIES

10,745	CUBIC YARDS CUT
1	CUBIC YARDS FILL
10,744	CUBIC YARDS CUT

NOTES:
1. ESTIMATE DOES NOT INCLUDE DEEPENED FOOTINGS, CAISSON PIERS BELOW FOUNDATION SLAB, UTILITY TRENCH VOLUMES. ESTIMATE ASSUMES 1' STRUCTURAL SECTION FOR PODIUM BASE SLAB OR ANY OVEREXCAVATION, IF REQUIRED BY SITE CONDITIONS.
2. ESTIMATE ASSUMES A 15% COMPACTION FACTOR ON ALL FILL MATERIAL AND A 0% EXPANSION FACTOR ON ALL CUT MATERIAL.
3. PRIOR TO COMMENCEMENT OF WORK CONTRACTOR SHALL CONFIRM THAT ESTIMATES ARE CORRECT.

NOTES:

1. ALL COMPACTION AND GRADING SHALL BE PERFORMED UNDER THE STRICT SUPERVISION OF THE GEOTECHNICAL ENGINEER AND PER ALL RECOMMENDATIONS IN THE PROJECT GEOTECHNICAL INVESTIGATION. MATERIAL TO BE COMPACTED OR REWORKED SHOULD BE MOISTURE-CONDITIONED OR DRIED TO ACHIEVE NEAR-OPTIMUM CONDITIONS, AND COMPACTED TO ACHIEVE THE FOLLOWING MINIMUM RELATIVE COMPACTION:
   A. ALL FILL AND COMPACTED BUILDING SUBGRADE: 90%
   B. UPPER 6 INCHES OF SUBGRADE IN PAVEMENT/DRIVE AREAS: 95%
   C. BASE ROCK AND SUB-BASE: 95%
2. BUILDING PAD: THE NATIVE SUBGRADE BENEATH SHALLOW FOUNDATIONS SHALL BE REWORKED TO A DEPTH SUFFICIENT TO PROVIDE A ZONE OF COMPACTED FILL EXTENDING AT LEAST 4 FEET BELOW FINISHED SUBGRADE. EXTENT OF SUBGRADE PREPARATION SHALL INCLUDE THE BUILDABLE ENVELOPE FOR EACH LOT AND SHALL INCLUDE A 3 FEET OVERBUILD. THE REMOVAL OF TREES IN THE AREA OF THE PROPOSED BUILDINGS IS ANTICIPATED. GEOTECHNICAL ENGINEER RECOURSES AN OPPORTUNITY TO OBSERVE THE SUBGRADE IN THE AREA OF TREE REMOVAL. TREE ROOTS MUST BE REMOVED PER SECTION 5.2.4(C)
3. GEOTECHNICAL ENGINEERS SHALL OBSERVE HOLES RESULTING FROM TREE REMOVAL PER SECTION 5.2.6 OF THE GEOTECHNICAL REPORT.
4. CONTRACTOR TO VERIFY THE STRUCTURAL SECTION FOR SLAB ON GRADE FLOORS WITH ARCHITECTURAL AND STRUCTURAL DRAWINGS PRIOR TO CONSTRUCTION.
5. ALL STORM DRAIN PIPES SHOWN HEREON SHALL BE MINIMUM 6" DIAMETER UNLESS NOTED OTHERWISE. FINAL SIZING TO BE DETERMINED DURING CONSTRUCTION DOCUMENT PHASE.
6. SCM(S) PER DETAIL(S) 1, C3.1. REFER TO STORMWATER CONTROL PLAN FOR ADDITIONAL INFORMATION REGARDING DRAINAGE SYSTEM DESIGN AND STORMWATER MITIGATION MEASURES.

INDICATES TREE TO BE REMOVED

INDICATES RETAINING/LANDSCAPING WALL.

GRAPHIC SCALE: 1 INCH = 10 FEET

CALL BEFORE YOU DIG 811 USA

NO.	BY	REVISION	DATE
1	DD	PLAN REVIEW COMMENT RESPONSE	11/6/2025
2	DD	PLAN REVIEW COMMENT RESPONSE	1/16/2026

Exhibit D

IFLAND ENGINEERS
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5900 BEARDSLEY AVE., SUITE A2
SANTA ROSA, CA 95409
PH: (707) 542-9500
www.ifland.com

APN 025-013-37
DESIGN DEVELOPMENT

DATE	DESIGN	DRAWN
05/17/24	DD	DD

SHEET C1.0

JOB NO. 23026

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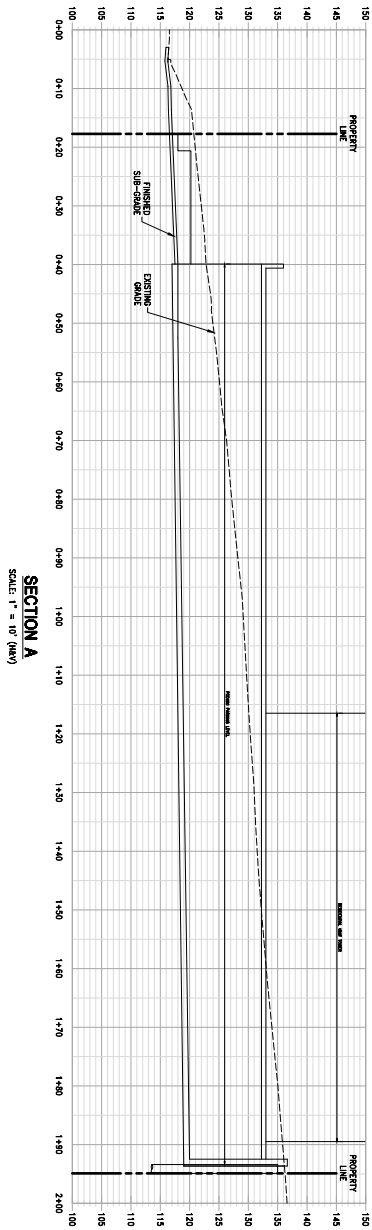
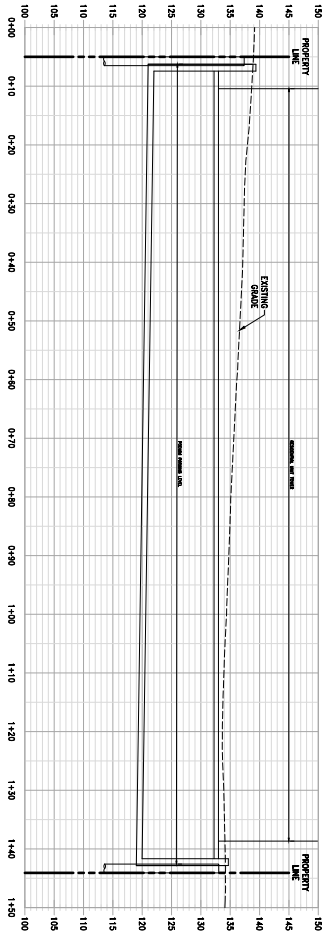


SECTION A
SCALE: 1" = 10' (HAV)



SECTION B
SCALE: 1" = 10' (HAV)

GRAPHIC SCALE: 1 INCH = 20 FEET

PRELIMINARY

NOT FOR CONSTRUCTION

JOB NO.	SHEET				
23026	C1.1	APN 025-013-37 DESIGN DEVELOPMENT			
		DATE 05/17/24	DESIGN DD	DRAWN DD	

GRADING SECTIONS

PAUL SWEET ROAD

3500 PAUL SWEET ROAD, SANTA CRUZ, CALIFORNIA

IFLAND ENGINEERS
CIVIL ENGINEERING ▪ LAND PLANNING ▪ STRUCTURAL DESIGN
1200 SEABRIGHT AVE, SUITE A2
SANTA CRUZ, CA 95062
TEL: (831) 427-0778
FAX: (831) 427-0774
www.IFLANDengineers.com

BY	REVISION	DATE
DD	2 PLAN REVIEW COMMENT REVISIONS	1/15/2025
DD	1 PLAN REVIEW COMMENT REVISIONS	5/14/2025

Exhibit D

FIRE HYDRANT DATA

FLOW DATA PROVIDED BY THE CITY OF SANTA CRUZ WATER DEPARTMENT DATED 05/11/2023

HYDRANT #	HYDRANT TYPE	STATIC PRESSURE (PSI)	RESIDUAL PRESSURE (PSI)	FLOW (GPM)	FLOW @ 20PSI (GMP)
918	6" DOUBLE	62	54	1061	2598
1036	6" STEAMER	72	58	839	1704

REQUIRED FIRE FLOW IS 1,000 GPM FOR 120 MIN FOR TYPE IA CONSTRUCTION AND 1,000 GPM FOR 180 MIN FOR TYPE IIIA CONSTRUCTION. PROTECTED WITH AN NFPA 13 FIRE SPRINKLER SYSTEM. SEE SHEET AP0.52 FOR FIRE FLOW CALCULATIONS AND ADDITIONAL INFORMATION.

NOTES

7

1. FINAL PLANS SHALL BE IN COMPLIANCE WITH 2022 CFC, 2022 CBC, AND CENTRAL FIRE DISTRICT AMENDMENTS..
2. FINAL PLANS SHALL PROVIDE THE TYPE, MODEL, AND SIZE OF NEW FIRE HYDRANTS. NEW HYDRANT SHALL BE INSTALLED PRIOR TO CONSTRUCTION OF BUILDING.
3. PROPOSED BUILDING SHALL BE PROTECTED BY AN APPROVED AUTOMATIC SPRINKLER SYSTEM COMPLYING WITH THE EDITION OF NFPA 13 CURRENTLY ADOPTED IN CHAPTER 35 OF THE CALIFORNIA BUILDING CODE.
4. TURNAROUNDS, FIRE LANES, AND FIRE LANE SIGNAGE SHALL MEET THE MINIMUM REQUIREMENTS OF THE COUNTY OF SANTA CRUZ AND THE CENTRAL FIRE DISTRICT ORDINANCE/STANDARDS.
5. ALL EXISTING SEPTIC SYSTEMS AND/OR SEWER LATERALS SERVING STRUCTURES TO BE DEMOLISHED SHALL BE BE LOCATED AND ABANDONED PER SCCDC FIG SS-15. APPLICANT SHALL REQUEST A SEPARATE SEWER LATERAL ABANDONMENT PERMIT.
6. BIOFILTRATION UNITS (SCM-1a – SCM-1d & OCS) PER DETAIL 1-3, C3.1.
7. DRY UTILITIES TO BE DESIGNED BY OTHERS. TRANSFORMERS AND JOINT TRENCHES SHOWN FOR COORDINATION PURPOSES ONLY.
8. EXISTING PG&E UTILITY CONNECTIONS – GAS & ELEC. TO BE ABANDONED IN COORDINATION WITH PG&E.
9. EXISTING WATER SERVICE TO REMAIN AND BE UPGRADED FOR PROJECT IRRIGATION SERVICE. BACKFLOW TO BE ADDED PER SCWD STDS.
10. COVERED PARKING AND TRASH ENCLOSURE SHALL BE DRAINED VIA FLOOR DRAINS WITH P-TRAP PRIMER CONNECTED TO IRRIGATION WATER SYSTEM
11. APPROXIMATE DOMESTIC WATER FIXTURE UNIT TOTAL = 1622, (PER ARCHITECTS). 3" METER SELECTED, RATED FOR 701-1750 FIXTURE UNITS, PER UPC METER SIZING CHART.

NOT FOR CONSTRUCTION

PRELIMINARY

EX FH #918, AT INTERSECTION OF PAUL SWEET RD & CHAMINADE LANE, APPROX. 200 FT NORTH OF PROJECT PARCEL

PAUL SWEET ROAD

EX. 10" WATER MAIN

APN 025-011-04

APN 025-013-38

APN 025-013-34

PODIUM BUILDING

TRANSFORMER, BY OTHERS

CO(S) INV 111.75 (TYP)

SCM-1a TW 116.25 TBS 115.50 TDR 113.50 INV PERF 111.75 BRB 111.50 PERF 1.25"ø x60LF

OVERFLOW RIM 116.00 INV 113.00

TD RIM 109.90 INV 108.40

OCS-1a 18x18 RIM 116.00 INV PERF 111.75 INV OVERFLOW 112.75 INV SD 107.85

6" FIRE SERVICE CONNECTION, COMPACT BACKFLOW & ASSEMBLY (NOTE 11)

OCS-1b 18x18 RIM 117.50 INV PERF 115.25 INV OVERFLOW 116.25 INV SD 107.50

EX. CI RIM 113.90 INV 106.24 NEW INV 107.25

3" DOM. SERVICE CONNECTION (NOTE 10)

FIRE HYDRANT (NOTE 2)

CO(S) INV 115.25 (TYP)

SCM-1b TW 120.25 TBS 119.00 TDR 117.00 INV PERF 115.25 BRB 115.00 PERF 1.25"ø x158LF

OVERFLOW RIM 119.50 INV 116.50

CURB CUT

CO INV 115.25

CURB CUT

SCM-1c TW 120.25 TBS 119.00 TDR 117.00 INV PERF 115.25 BRB 115.00 PERF 1.25"ø x72LF

CO(S) INV 115.25 (TYP)

OCS-1c 18x18 RIM 117.57 INV PERF 115.25 INV OVERFLOW 116.25 INV SD 108.66

OVERFLOW RIM 119.50 INV 116.50

OUTLET INV 116.00

TD RIM 116.60 INV 116.20

TD RIM 117.42 INV OUT 116.10

SCM-1d TW 118.25 TBS 115.50 TDR 113.50 INV PERF 111.75 BDR 109.50

OCS-1d 18x18 RIM 117.94 INV PERF 111.75 INV OVERFLOW 112.75 INV SD 109.50 PERF 1.25"ø x56LF

OVERFLOW RIM 116.00 INV 113.00

WM. WATER SERV. & BFP. (NOTE 8)

CONTINUATION OF IRRIGATION SYSTEM PER LANDSCAPE PLANS (BY OTHERS)

CO(S) INV 111.75 (TYP)

EX FH #1036, ALONG PAUL SWEET RD, APPROX. 650 FE SOUTH OF PROJECT PARCEL

EX PRIVATE FH AT END OF DOMINICAN OAKS PARKING LOT ALONG PAUL SWEET RD, APPROX. 100 FT NORTH OF PROJECT PARCEL, HYDRANT TYPE AND FLOW RATE NOT DOCUMENTED

EX. SS LAT. (UNUSED, CAPPED 3' FROM MANHOLE, TO BE REMOVED)

EX. SSMH (TO BE REMOVED) RIM 136.74 INV 127.44

EX. SS LAT. (UNUSED, TO BE REMOVED)

EX. 6" SS (ON-SITE SEGMENT TO BE REMOVED)

EX. SS LAT. (SERVES ON-SITE DWELLING SET FOR DEMOLITION, TO BE REMOVED)

6" SS OUTLET INV 127.0±

COTG INV TO MATCH EX. 6"SS (APPOX 126.5±)

TIE IN TO EX. 6"SS AT PROPERTY LINE

EX. 6" SS (OFF-SITE SEGMENT TO BE REUSED AND/OR REPLACED WHERE IN POOR CONDITION)

SEE INSET ABOVE

SEE PLAN BELOW

EX. SS LAT. (BELIEVED UNUSED, TO BE VERIFIED DURING CONSTRUCTION)

EX. SSMH RIM 133.07 INV 121.00

EX. 8"SS (TO PAUL SWEET SS MAIN)

GRAPHIC SCALE: 1 INCH = 10 FEET

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NO.	REVISION	DATE	BY
1	PLAN REVIEW COMMENT RESPONSE	1/10/2025	DD
2	PLAN REVIEW COMMENT RESPONSE	5/6/2025	DD

Exhibit D

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UTILITY PLAN

PAUL SWEET ROAD

3500 PAUL SWEET ROAD, SANTA CRUZ, CALIFORNIA

APN 025-013-37
DESIGN DEVELOPMENT

DRAWN DD
DESIGN DD
DATE 05/17/24

SHEET C2.0

JOB NO. 23026

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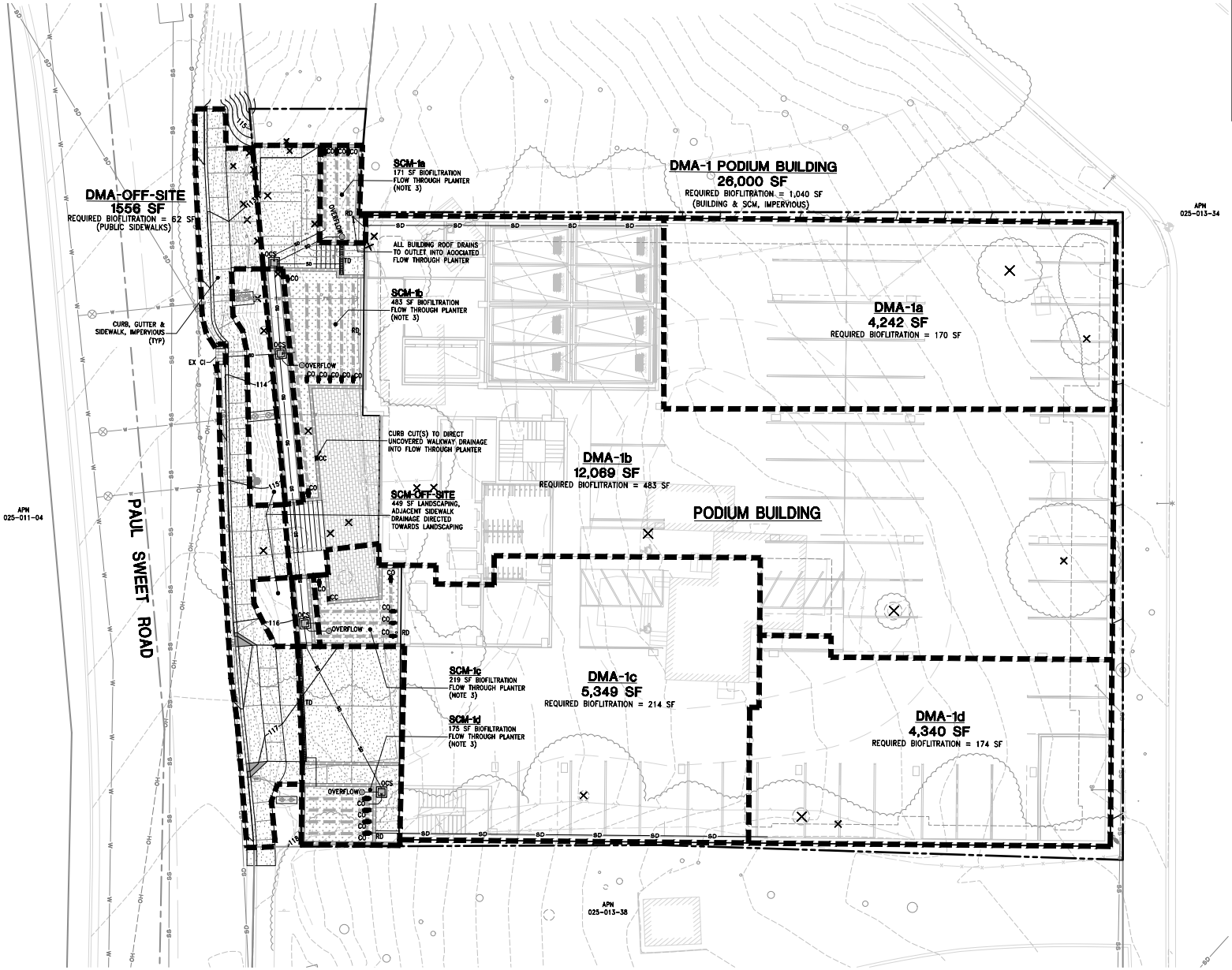


IMPERVIOUS SURFACE TABULATION

EXISTING		
ON-SITE:	3,406 SF	IMPERVIOUS
OFF-SITE:	0 SF	IMPERVIOUS
TOTAL	3,406 SF	
PROPOSED		
DMA-1:	25,396 SF	IMPERVIOUS
SCM-1:	1,048 SF	IMPERVIOUS
DMA-2:	1,556 SF	IMPERVIOUS
TOTAL	26,000 SF (3,406 SF REPLACED, BALANCE NEW)	

DMA PROPOSED AREA TABULATION

DMA	IMPERV.	DMA-2 OFF.	SCM	TOTAL
DMA-1 (ON-SITE)	23,396	1,556	1,048	26,000
DMA-1a	4,006	65	171	4,242
DMA-1b	10,499	1,087	483	12,069
DMA-1c	4,756	374	219	5,349
DMA-1d	4,135	30	175	4,340
DMA-2 (OFF-SITE)	1,556	1,556	0	0
TOTAL	24,952		1,048	26,000

MITIGATION

DMA-1 (ON-SITE): SCM-1 1,048 SF BIOFILTRATION/FLOW THROUGH PLANTER (4% MIN) W/ DETENTION CHAMBER(S) & CONTROLLED RELEASE.

DMA-2 (OFF-SITE): OFF-SET BIOFILTRATION/FLOW THROUGH PLANTER (4% MIN) WITH DETENTION CHAMBER(S) & CONTROLLED RELEASE ADDED TO SCM-1. SIDEWALKS SLOPE TOWARDS ADJACENT LANDSCAPING.

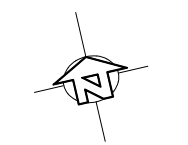
SCM-1 (1a-1d): 1,048 SF BIOFILTRATION FLOW THROUGH PLANTER
SIZING CHECK (4% RULE)
TRIBUTARY AREA:
- DMA-1 (ON-SITE) 26,000 SF
- DMA-2 (OFF-SITE) 0 SF (OFF-SET)
TOTAL 26,000 SF x 4% = 1,040 SF MIN
BIO-FILTRATION AREA AREA PROVIDED = 1,048 SF (OK).

DETENTION ROCK BED CALCULATED DEPTH = 1.75' PER SWM-17.

SCM-OFFSITE ADDITIONAL MITIGATION PROVIDED FOR OFF-SITE IMPROVEMENTS BY DIRECTING RUNOFF FROM SIDEWALKS TO ADJACENT LANDSCAPING, FOR TREATMENT AND INFILTRATION.

NOTES

1. THE PROJECT HAS MORE THAN 5,000 SF OF NEW OR REPLACED IMPERVIOUS SURFACES AND THEREFORE QUALIFIES AS A LARGE PROJECT PER THE COUNTY'S STORMWATER BMP MANUAL.
2. RUNOFF REDUCTION IS PROVIDED BY IMPLEMENTING LID MEASURES WHERE PRACTICAL.
3. TREATMENT WILL BE PROVIDED BY FLOW-THROUGH PLANTER BIOFILTRATION UNIT(S) LOCATED ALONG WEST/FRONT SIDE OF THE BUILDING. FINAL SIZING AND OUTLET CONTROL ORIFICE SIZING TO BE PROVIDED IN THE FINAL CIVIL PLAN SET. SEE SHEET C3.1 FOR PRELIMINARY FLOW THROUGH PLANTER DETAILS.
4. MITIGATION WILL NOT FEATURE RETENTION. ON-SITE RETENTION HAS BEEN DEEMED INFEASIBLE. THIS FINDING HAS BEEN DETERMINED IN COORDINATION WITH THE PROJECT GEOTECHNICAL ENGINEER AND IS DUE TO THE FOLLOWING FACTORS: SHALLOW GROUNDWATER IS PRESENT. IMPERMEABLE SHALLOW BEDROCK IS PRESENT THROUGHOUT THE SITE. PROPOSED PROJECT FEATURES SUBTERRANEAN PODIUM FOUNDATIONS COVERING MAJORITY OF SITE AND MUST NOT BE IN PROXIMITY OF INFILTRATION UNITS. (SEE PRELIMINARY STORMWATER REPORT).
5. MITIGATION WILL FEATURE DETENTION. STORMWATER WILL FLOW THROUGH TREATMENT PLANTERS TO RETENTION CHAMBER(S) BELOW AND ASSOCIATED OUTLET CONTROL STRUCTURE(S). THESE FEATURES ARE SIZED FOR FLOOD CONTROL BY RETAINING A 25-YEAR STORM AND RELEASING IT AT THE 10-YEAR PRE-DEVELOPMENT RATE. SEE DETAIL 1, C3.1 FOR SCM DETAIL.
6. NEW AND REPLACED OFF-SITE IMPERVIOUS SURFACES INCLUDING CURB, GUTTER & SIDEWALK IMPROVEMENTS CANNOT BE MITIGATED DIRECTLY AS THEY ARE DOWNSTREAM OF THE PROJECT SITE. THESE FEATURES WILL BE MITIGATED VIA AN OFF-SET WHERE ON-SITE SCM(S) WILL BE SIZED TO MITIGATE THE EQUIVALENT AREA IN ADDITION TO THEIR ASSOCIATED ON SITE DMA(S).
7. POST MITIGATION RUNOFF FROM THE SITE WILL BE HARD-PIPED TO THE PUBLIC STORMWATER SYSTEM LOCATED IN PAUL SWEET ROAD. SEE STORMWATER REPORT FOR DOWNSTREAM ANALYSIS.
8. COVERED PARKING GARAGE INLETS AND INTERIOR FLOOR DRAINS WILL BE CONNECTED TO THE SANITARY SEWER SYSTEM.



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NOT FOR CONSTRUCTION

PRELIMINARY

STORMWATER CONTROL PLAN

PAUL SWEET ROAD

3500 PAUL SWEET ROAD, SANTA CRUZ, CALIFORNIA

APN 025-013-37
DESIGN DEVELOPMENT

DATE 05/17/24 | DESIGN DD | DRAWN DD

SHEET C3.0

JOB NO. 23026

BY	REVISION	DATE
DD	1 PLAN REVIEW COMMENT RESPONSE	7/10/2025
DD	2 PLAN REVIEW COMMENT RESPONSE	8/4/2025

Exhibit D

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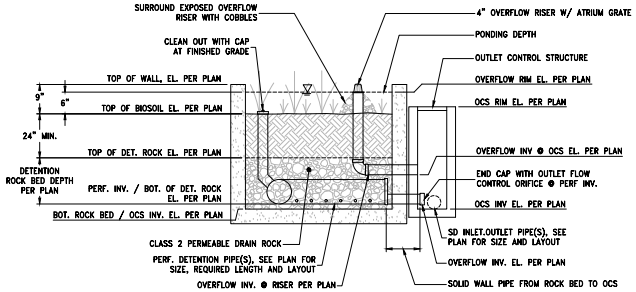
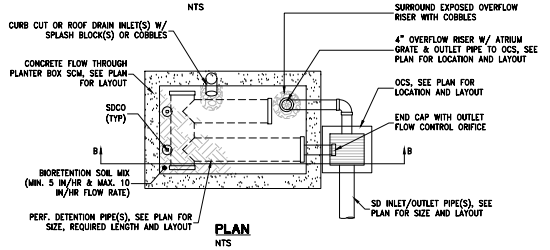


SECTION A-A
NTS



PLAN
NTS

FLOW THROUGH PLANTER SCM

NOTES

1. SURFACE OF THE PLANTING BED SHALL BE RELATIVELY LEVEL BUT MAY HAVE A SLIGHT SLOPE TO DISTRIBUTE WATER THROUGHOUT SURFACE AREA.
2. INLET OF THE OVERFLOW DRAIN SHOULD BE AT LEAST 6 INCHES ABOVE THE LOW POINT OF THE PLANTING AREA AND AT LEAST 2 INCHES ABOVE THE HIGH POINT OF THE PLANTING AREA. PLANTER BOX WALLS SHALL BE HIGHER THAN THE OVERFLOW ELEVATION. PROVIDE 4 INCHES OF FREEBOARD AND AN OVERFLOW POINT AWAY FROM STRUCTURES SHOULD BE PROVIDED.

UNDER DRAIN AND OVERFLOW

1. INSTALL WATERPROOFING AS NECESSARY TO PROTECT ADJACENT BUILDING WALLS.
2. DETENTION PIPING SHALL CONSIST OF A MINIMUM 15" INCH DIAMETER PERFORATED PIPE WITH CLEANOUTS AND CONNECTION TO A STORM DRAIN OR DISCHARGE POINT. LENGTH AND CONFIGURATION PER PLAN. ASSEMBLY SHALL BE NDS N-12 HDPE OR APPROVED ALTERNATE.
3. THE UNDER DRAIN TRENCH SHALL INCLUDE A MINIMUM 12 INCH THICK LAYER OF CLASS 2 PERMEABLE DRAIN ROCK. ACTUAL DEPTH PER PLAN. PLACE UNDER DRAIN / DETENTION PIPING NEAR THE BOTTOM OF THE DRAIN ROCK LAYER, WITH PERFORATIONS FACING DOWNWARD.
4. CLEANOUT(S) FOR THE DETENTION PIPING NETWORK SHALL BE PROVIDED, CONSISTING OF A VERTICAL, RIGID, NON PERFORATED PVC PIPE, WITH A MINIMUM DIAMETER OF 4 INCHES AND A WATERTIGHT CAP FIT FLUSH WITH THE PLANTER BED SURFACE.
5. TO AVOID CLOGGING, FILTER FABRIC SHALL MOT BE USED IN OR AROUND THE THE UNDER DRAIN OR BETWEEN THE BIOTREATMENT SOIL MIX AND THE DRAIN ROCK. IF DESIRED, A 2 INCH PEA GRAVEL LAYER MAY BE USED BETWEEN THE BIOTREATMENT SOIL MIX AND THE DRAIN ROCK.

SOIL REQUIREMENTS

1. PLANTING SOILS SHALL MEET THE BIOTREATMENT SOIL MIX SPECIFICATIONS APPROPRIATE FOR THE JURISDICTION. A MINIMUM INFILTRATION RATE OF 5 IN/HR AND A MAXIMUM INFILTRATION RATE OF 10 IN/HR ARE REQUIRED.

VEGETATION

1. PLANT SPECIES SELECTED SHALL BE SUITABLE FOR FLOW THROUGH PLANTER LOCATION, BIOTREATMENT SOILS AND OCCASIONAL INUNDATION.
2. VEGETATION SHOULD NOT BLOCK INFLOW, CREATE SAFETY ISSUES OR OBSTRUCT FACILITIES.
3. PLANTING SELECTIONS ARE SUBJECT TO THE LANDSCAPING REQUIREMENTS OF THE LOCAL JURISDICTION AND SHALL BE SELECTED BY A LICENSED LANDSCAPE ARCHITECT OR ARCHITECT.

CONSTRUCTION REQUIREMENTS

1. AT GRADE PLANTERS ARE NOT INTENDED TO WORK AS CONSTRUCTION PHASE BMP'S. PROTECT THE AREA FROM CONSTRUCTION SITE RUNOFF. DIVERT RUNOFF FROM UNSTABILIZED AREAS AWAY FROM COMPLETED PLANTER AREAS.

MAINTENANCE

1. CONDUCT BIANNUAL EVALUATION OF THE HEALTH OF THE VEGETATION AND REMOVE AND REPLACE DEAD OR DYING PLANTS.
2. MAINTAIN VEGETATION AND THE IRRIGATION SYSTEM.
3. AVOID THE USE OF PESTICIDES AND QUICK RELEASE SYNTHETIC FERTILIZERS.
4. BEFORE THE WET SEASON BEGINS, VERIFY THAT THERE IS SUFFICIENT BIOTREATMENT SOIL MEDIA TO EFFECTIVELY FILTER STORMWATER. REMOVE ACCUMULATIONS OF SEDIMENT, LITTER AND DEBRIS AS NECESSARY.
5. PERIODICALLY CHECK DOWNSPOUTS, INLETS AND OVERFLOW PIPING. REMOVE DEBRIS AND REPAIR/REPLACE DAMAGED OR DISCONNECTED PIPES.

1

NOT FOR CONSTRUCTION

PRELIMINARY

STORMWATER CONTROL DETAILS

PAUL SWEET ROAD

3500 PAUL SWEET ROAD, SANTA CRUZ, CALIFORNIA

APN 025-013-37
DESIGN DEVELOPMENT

DATE 05/17/24
DESIGN DD
DRAWN DD

SHEET C3.1

JOB NO. 23026

BY	REVISION	DATE
DD	1 PLAN REVIEW COMMENT REVISIONS	7/10/2025
DD	0 PLAN REVIEW COMMENT REVISIONS	6/4/2025

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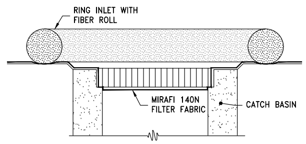


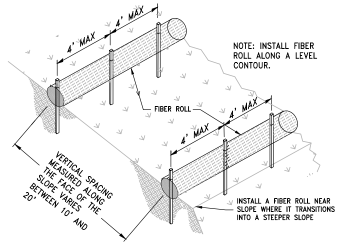
INSPECTION AND MAINTENANCE:

1. FILTER FABRIC BARRIERS SHALL BE INSPECTED WEEKLY AFTER EACH SIGNIFICANT STORM – 1 INCH RAINFALL (25.4 MM) IN 24 HOUR PERIOD. ANY REQUIRED REPAIRS SHALL BE MADE IMMEDIATELY.
2. SEDIMENT SHOULD BE REMOVED WHEN IT REACHES 3" MAXIMUM HEIGHT. AT THAT TIME INSPECT THE FILTER MATERIAL FOR TEARS AND CLEAN OR REPLACE AS REQUIRED.
3. THE REMOVED SEDIMENT SHALL BE DISTRIBUTED EVENLY ACROSS AREAS ON-SITE, CONFORM WITH THE EXISTING GRADE AND BE REVEGETATED OR OTHERWISE STABILIZED PER EROSION CONTROL NOTES.

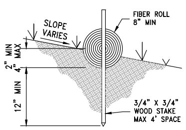
CATCH BASIN PROTECTION

NTS

2



TYPICAL INSTALLATION



ENTRENCHMENT DETAIL

CONSTRUCTION SPECIFICATIONS

1. PREPARE SLOPE BEFORE THE FIBER ROLL PROCEDURE IS STARTED. SHALLOW GULLIES SHOULD BE SMOOTHED AS WORK PROGRESSES.
2. DIG SMALL TRENCHES ACROSS SLOPE ON CONTOUR, TO PLACE FIBER ROLLS IN. THE TRENCH SHOULD BE DEEP ENOUGH TO ACCOMMODATE HALF THE THICKNESS OF THE FIBER ROLL. WHEN THE SOIL IS LOOSE AND UNCOMPACTED, THE TRENCH SHOULD BE DEEP ENOUGH TO BURY THE FIBER ROLL 2/3 OF ITS THICKNESS BECAUSE THE GROUND WILL SETTLE. IT IS CRITICAL THAT FIBER ROLLS ARE INSTALLED PERPENDICULAR TO WATER MOVEMENT, PARALLEL TO THE SLOPE CONTOUR.
3. START BUILDING TRENCHES AND INSTALL FIBER ROLLS FROM THE BOTTOM OF THE SLOPE AND WORK UP.
4. CONSTRUCT TRENCHES AT CONTOUR INTERVALS OF THREE TO EIGHT FEET APART DEPENDING ON STEEPNESS OF SLOPE. THE STEEPER THE SLOPE, THE CLOSER TOGETHER THE TRENCHES.
5. LAY THE FIBER ROLL ALONG THE TRENCHES FITTING IT SNUGLY AGAINST THE SOIL. MAKE SURE NO GAPS EXIST BETWEEN THE SOIL AND THE FIBER ROLL. USE A STRAIGHT BAR TO DRIVE HOLES THROUGH THE FIBER ROLL AND INTO THE SOIL FOR THE WOODEN STAKES.
6. DRIVE THE STAKE THROUGH THE PREPARED HOLE INTO THE SOIL. LEAVE ONLY ONE OR TWO INCHES OF STAKE EXPOSED ABOVE FIBER ROLL. IF USING WILLOW STAKES REFER TO USDA SOIL CONSERVATION SERVICE TECHNICAL GUIDE, BIOENGINEERING, FOR GUIDELINES TO PREPARING LIVE WILLOW MATERIAL.
7. INSTALL STAKES AT LEAST EVERY FOUR FEET APART THROUGH FIBER ROLL. ADDITIONAL STAKES MAY BE DRIVEN ON THE DOWNSLOPE SIDE OF THE TRENCHES ON HIGHLY EROSIVE OR VERY STEEP SLOPES.

INSTALLATION AND MAINTENANCE

8. INSPECT THE FIBER ROLL AND THE SLOPES AFTER SIGNIFICANT STORMS. MAKE SURE THE FIBER ROLLS ARE IN CONTACT WITH THE SOIL.
9. REPAIR ANY RILLS OR GULLIES PROMPTLY.
10. RESEED OR REPLANT VEGETATION IF NECESSARY UNTIL THE SLOPE IS STABILIZED.

FIBER ROLLS

NTS

SLOPE INSTALLATION TABLE	
SLOPE	MAX FIBER ROLL SPACING (FT)
4:1 (OR FLATTER)	20
4:1 TO 2:1	15
GREATER THAN 2:1	10

1

EROSION CONTROL NOTES

1. THE EROSION CONTROL PLANS IN THIS SET SHALL BE REVIEWED AND IMPLEMENTED BY THE CONTRACTOR PRIOR TO COMMENCEMENT OF WORK. ADDITIONAL DIRECTION, DETAILS, AND REQUIREMENTS ARE INCLUDED IN THE SWPPP. CONTRACTOR SHALL WORK WITH THE PROJECT'S QUALIFIED SWPPP PRACTITIONER (QSP) THROUGHOUT CONSTRUCTION TO ENSURE THE SITE IS PROPERLY PROTECTED FROM POSSIBLE POLLUTANTS. THE QSP HAS AUTHORIZATION TO ADD OR REMOVE BMP MEASURES THROUGHOUT CONSTRUCTION AS SPECIFIED IN THE SWPPP DOCUMENT.
2. THE QSP SHALL ENSURE ALL MONITORING AND INSPECTIONS ARE PERFORMED AS REQUIRED BY THE SWPPP AND ALL RECORDS ARE RETAINED ONSITE THROUGHOUT CONSTRUCTION.
3. NO LAND CLEARING, GRADING OR EXCAVATION SHALL BE DONE BETWEEN OCTOBER 1ST AND APRIL 30TH. ANY DEVIATION FROM THIS CONDITION REQUIRES REVIEW AND APPROVAL OF A SEPARATE WINTER EROSION CONTROL PLAN BY ENVIRONMENTAL PLANNING PRIOR TO BEGINNING CONSTRUCTION. THE DEVELOPER SHALL BE RESPONSIBLE FOR IMPLEMENTING AND MAINTAINING SITE EROSION CONTROL AT ALL TIMES.
4. IT SHALL BE THE RESPONSIBILITY OF THE OWNER AND THE PERMITTEE TO ENSURE THAT EROSION DOES NOT OCCUR FROM ANY ACTIVITY DURING OR AFTER PROJECT CONSTRUCTION. ADDITIONAL MEASURES, BEYOND THOSE SPECIFIED, MAY BE REQUIRED BY THE PLANNING DIRECTOR AS DEEMED NECESSARY TO CONTROL ACCELERATED EROSION.
5. PRIOR TO ANY FORECAST RAIN AND ANYTIME BETWEEN OCTOBER 1ST AND APRIL 30TH, AT THE END OF EACH WORKDAY, AT THE END OF EACH WORKWEEK, THE DEVELOPER SHALL IMPLEMENT ALL TEMPORARY MEASURES NECESSARY TO PREVENT EROSION AND SILTATION, UNTIL THE PROJECT HAS BEEN FINALIZED. THESE MEASURES SHALL INCLUDE, BUT NOT BE LIMITED TO, DIRECT SEEDING OF THE AFFECTED AREAS, STRAW MULCHING, AND/OR INSTALLATION OF STRAW BALES DAMS/SILT FENCES.
6. DURING CONSTRUCTION, NO TURBID WATER SHALL BE PERMITTED TO LEAVE THE SITE. USE OF SILT AND GREASE TRAPS, FILTER BERMS, OR SILT FENCES SHALL BE USED TO PREVENT SUCH DISCHARGE.
7. ALL AREAS ON- AND OFF-SITE EXPOSED DURING CONSTRUCTION ACTIVITIES, IF NOT PERMANENTLY LANDSCAPED PER PLAN, SHALL BE PROTECTED BY MULCHING AND/OR SEEDING WITH ANNUAL WINTER BARLEY.
8. ALL EXCAVATED MATERIAL SHALL BE REMOVED TO AN APPROVED DISPOSAL SITE OR DISPOSED OF ON-SITE IN A MANNER THAT WILL NOT CAUSE EROSION.
9. ANY MATERIAL STOCKPILED, FOR LONGER THAN 14 DAYS, DURING CONSTRUCTION SHALL BE COVERED WITH PLASTIC.
10. UPON COMPLETION OF CONSTRUCTION, ALL REMAINING EXPOSED SOILS SHALL BE PERMANENTLY REVEGETATED PER LANDSCAPING PLAN. THE PROTECTION REQUIRED BY SECTION 16.19.140 SHALL BE INSTALLED PRIOR TO CALLING FOR FINAL APPROVAL OF THE PROJECT AND AT ALL TIMES BETWEEN OCTOBER 1ST AND APRIL 30TH. SUCH PROTECTION SHALL BE MAINTAINED FOR AT LEAST ONE WINTER UNTIL PERMANENT PROTECTION IS ESTABLISHED.
11. EXPOSED SOIL ON SLOPES GREATER THAN 20% SHALL BE SEEDED, COVERED WITH 2 INCHES OF STRAW, AND AN EROSION CONTROL BLANKET. THE EROSION CONTROL BLANKET SHALL BE STAKED IN PLACE.
12. IT IS THE DEVELOPER'S RESPONSIBILITY TO SEE THAT ADDITIONAL MEASURES, NECESSARY TO CONTROL SITE EROSION AND PREVENT SEDIMENT TRANSPORT OFF-SITE ARE IMPLEMENTED.
13. ALL SPILLS AND/OR LEAKS SHALL BE IMMEDIATELY CLEANED UP AND MITIGATED PER THE SPILL RESPONSE REQUIREMENTS SPECIFIED IN THE SWPPP DOCUMENT AND THE CONTRACTORS O&M STANDARDS.

SITE HOUSEKEEPING NOTES

CONSTRUCTION MATERIALS
- ALL LOOSE STOCKPILED CONSTRUCTION MATERIALS THAT ARE NOT ACTIVELY BEING USED (I.E. SOIL, SPOILS, AGGREGATE, FLY-ASH, STUCCO, HYDRATED LIME, ETC.) SHALL BE COVERED AND BERMED.
- ALL CHEMICALS SHALL BE STORED IN WATERTIGHT CONTAINERS (WITH APPROPRIATE SECONDARY CONTAINMENT TO PREVENT ANY SPILLAGE OR LEAKAGE) OR IN A STORAGE SHED (COMPLETELY ENCLOSED).
- EXPOSURE OF CONSTRUCTION MATERIALS TO PRECIPITATION SHALL BE MINIMIZED. THIS DOES NOT INCLUDE MATERIALS AND EQUIPMENT THAT ARE DESIGNED TO BE OUTDOORS AND EXPOSED TO ENVIRONMENTAL CONDITIONS (I.E. POLES, EQUIPMENT PADS, CABINETS, CONDUCTORS, INSULATORS, BRICKS, ETC.).
- BEST MANAGEMENT PRACTICES TO PREVENT THE OFF-SITE TRACKING OF LOOSE CONSTRUCTION AND LANDSCAPE MATERIALS SHALL BE IMPLEMENTED.

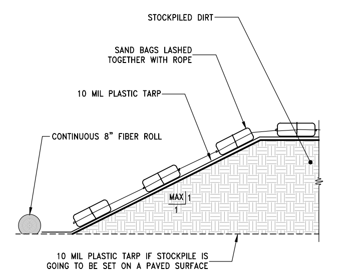
WASTE MANAGEMENT
- DISPOSAL OF ANY RINSE OR WASH WATERS OR MATERIALS ON IMPERVIOUS OR PERVIOUS SITE SURFACES OR INTO THE STORM DRAIN SYSTEM SHALL BE PREVENTED.
- SANITATION FACILITIES SHALL BE CONTAINED (E.G. PORTABLE TOILETS) TO PREVENT DISCHARGES OF POLLUTANTS TO THE STORM WATER DRAINAGE SYSTEM OR RECEIVING WATER, AND SHALL BE LOCATED A MINIMUM 20 FEET AWAY FROM AN INLET, STREET OR DRIVEWAY, STREAM, RIPARIAN AREA OR OTHER DRAINAGE FACILITY.
- SANITATION FACILITIES SHALL BE INSPECTED REGULARLY FOR LEAKS AND SPILLS AND CLEANED OR REPLACED AS NECESSARY.
- COVER WASTE DISPOSAL CONTAINERS AT THE END OF EVERY BUSINESS DAY AND DURING A RAIN EVENT.
- DISCHARGES FROM WASTE DISPOSAL CONTAINERS TO THE STORM WATER DRAINAGE SYSTEM OR RECEIVING WATER SHALL BE PREVENTED.
- STOCKPILED WASTE MATERIAL SHALL BE CONTAINED AND SECURELY PROTECTED FROM WIND AND RAIN AT ALL TIMES UNLESS ACTIVELY BEING USED.

  PROCEDURES THAT EFFECTIVELY ADDRESS HAZARDOUS AND NON-HAZARDOUS SPILLS SHALL BE IMPLEMENTED.EQUIPMENT AND MATERIALS FOR CLEANUP OF SPILLS SHALL BE AVAILABLE ON SITE AND THAT SPILLS AND LEAKS SHALL BE CLEANED UP IMMEDIATELY AND DISPOSED OF PROPERLY; AND
- CONCRETE WASHOUT AREAS AND OTHER WASHOUT AREAS THAT MAY CONTAIN ADDITIONAL POLLUTANTS SHALL BE CONTAINED SO THERE IS NO DISCHARGE INTO THE UNDERLYING SOIL AND ONTO THE SURROUNDING AREAS.

VEHICLE STORAGE AND MAINTENANCE
- MEASURES SHALL BE TAKEN TO PREVENT OIL, GREASE, OR FUEL TO LEAK IN TO THE GROUND, STORM DRAINS OR SURFACE WATERS.
- ALL EQUIPMENT OR VEHICLES, WHICH ARE TO BE FUELED, MAINTAINED AND STORED ONSITE SHALL BE IN A DESIGNATED AREA FITTED WITH APPROPRIATE BMPs.
- LEAKS SHALL BE IMMEDIATELY CLEANED AND LEAKED MATERIALS SHALL BE DISPOSED OF PROPERLY.

LANDSCAPE MATERIALS
- CONTAIN STOCKPILED MATERIALS SUCH AS MULCHES AND TOPSOIL WHEN THEY ARE NOT ACTIVELY BEING USED
- CONTAIN FERTILIZERS AND OTHER LANDSCAPE MATERIALS WHEN THEY ARE NOT ACTIVELY BEING USED.
- DISCONTINUE THE APPLICATION OF ANY ERODIBLE LANDSCAPE MATERIAL WITHIN 2 DAYS BEFORE A FORECASTED RAIN EVENT OR DURING PERIODS OF PRECIPITATION.
- APPLY ERODIBLE LANDSCAPE MATERIAL AT QUANTITIES AND APPLICATION RATES ACCORDING TO MANUFACTURE RECOMMENDATIONS OR BASED ON WRITTEN SPECIFICATIONS BY KNOWLEDGEABLE AND EXPERIENCED FIELD PERSONNEL.
- STACK ERODIBLE LANDSCAPE MATERIAL ON PALLETS AND COVERING OR STORING SUCH MATERIALS WHEN NOT BEING USED OR APPLIED.

NOT FOR CONSTRUCTION

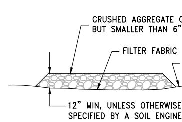


NOTES:
1. STOCKPILE SIZE AND LOCATIONS TO BE DETERMINED BY CONTRACTOR WITH ENGINEER'S APPROVAL.
2. USE OF NON-ACCESSIBLE PARKING STALLS FOR STOCKPILE AREA TO BE APPROVED BY OWNER PRIOR TO USE. IF AREA CANNOT BE USED, CONTRACTOR SHALL SECURE APPROVAL FOR AN ALTERNATE AREA OR ARRANGE FOR IMMEDIATE OFF-HAUL OF MATERIALS SUCH THAT STOCKPILING OF MATERIALS IS NOT NECESSARY.

DIRT STOCKPILE

NTS

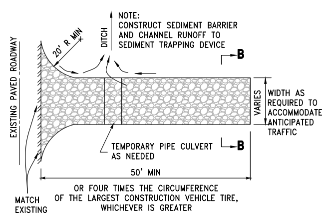
4



SECTION B-B

NTS

NOTES:
1. THE ENTRANCE SHALL BE MAINTAINED IN A CONDITION THAT WILL PREVENT TRACKING OR FLOWING OF SEDIMENT ONTO PUBLIC RIGHT-OF-WAYS. THIS MAY REQUIRE TOP DRESSING, REPAIR AND/OR CLEANOUT OF ANY MEASURES USED TO TRAP SEDIMENT.
2. WHEN NECESSARY, WHEELS SHALL BE CLEANED PRIOR TO ENTRANCE ONTO PUBLIC RIGHT-OF-WAY.
3. WHEN WASHING IS REQUIRED, IT SHALL BE DONE ON AN AREA STABILIZED WITH CRUSHED STONE THAT DRAINS INTO AN APPROVED SEDIMENT TRAP OR SEDIMENT BASIN.



CONSTRUCTION SPECIFICATIONS:

1. THE AGGREGATE SIZE FOR CONSTRUCTION OF THE PAD SHALL BE 2-3 INCH (50-75 MM) STONE. PLACE THE GRAVEL TO THE SPECIFIC GRADE AND DIMENSIONS SHOWN ON THE PLANS, AND SMOOTH IT.
2. THE THICKNESS OF THE PAD SHALL NOT BE LESS THAN 6 INCHES (152 MM). USE GEOTEXTILE FABRICS, IF NECESSARY, TO IMPROVE STABILITY OF THE FOUNDATION IN LOCATIONS SUBJECT TO SEEPAGE OR HIGH WATER TABLE.
3. THE WIDTH OF THE PAD SHALL NOT BE LESS THAN THE FULL WIDTH OF ALL POINTS OF INGRESS OR EGRESS AND IN ANY CASE SHALL NOT BE LESS THAN 12 FEET (3.6 M) WIDE.
4. THE LENGTH OF THE PAD SHALL BE AS REQUIRED, BUT NOT LESS THAN 50 FEET (15.2 M).
5. LOCATE CONSTRUCTION ENTRANCES AND EXITS TO LIMIT SEDIMENT LEAVING THE SITE AND TO PROVIDE FOR MAXIMUM UTILITY BY ALL CONSTRUCTION VEHICLES. AVOID ENTRANCES WHICH HAVE STEEP GRADES AND ENTRANCES AT CURVES IN PUBLIC ROADS.
6. THE ENTRANCE SHALL BE MAINTAINED IN A CONDITION THAT WILL PREVENT TRACKING OR FLOWING OF SEDIMENT ONTO PUBLIC RIGHTS-OF-WAY. THIS MAY REQUIRE PERIODIC TOP DRESSING WITH ADDITIONAL STONE AS CONDITIONS DEMAND, AND REPAIR AND/OR MAINTENANCE OF ANY MEASURES USED TO TRAP SEDIMENT.
7. ALL SEDIMENT SPILLED, DROPPED, WASHED OR TRACKED ONTO PUBLIC RIGHTS-OF-WAY SHALL BE REMOVED IMMEDIATELY.
8. PROVIDE DRAINAGE TO CARRY WATER TO A SEDIMENT TRAP OR OTHER SUITABLE OUTLET.
9. WHEN NECESSARY, WHEELS SHALL BE CLEANED TO REMOVE SEDIMENT PRIOR TO ENTRANCE ONTO PUBLIC RIGHTS-OF-WAY. WHEN WASHING IS REQUIRED, IT SHALL BE DONE ON AN AREA STABILIZED WITH CRUSHED STONE THAT DRAINS INTO AN APPROVED SEDIMENT TRAP OR SEDIMENT BASIN. SEE SEDIMENT BASIN BMP.
10. ALL SEDIMENT SHALL BE PREVENTED FROM ENTERING ANY STORM DRAIN, DITCH OR WATERCOURSE THROUGH USE OF SAND BAGS, GRAVEL, STRAW BALES, OR OTHER APPROVED METHODS.

INSPECTION AND MAINTENANCE:

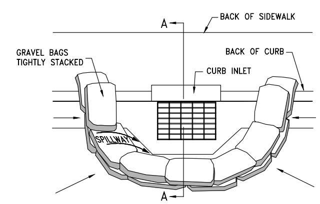
11. MAINTAIN THE GRAVEL PAD IN A CONDITION TO PREVENT MUD OR SEDIMENT FROM LEAVING THE CONSTRUCTION SITE.
12. REPLACE GRAVEL MATERIAL WHEN SURFACE VOIDS ARE VISIBLE.
13. AFTER EACH RAINFALL, INSPECT ANY STRUCTURE USED TO TRAP SEDIMENT AND CLEAN IT OUT AS NECESSARY.
14. IMMEDIATELY REMOVE ALL OBJECTIONABLE MATERIALS SPILLED, WASHED, OR TRACKED ONTO PUBLIC ROADWAYS. REMOVE ALL SEDIMENT DEPOSITED ON PAVED ROADWAYS WITHIN 24 HOURS.

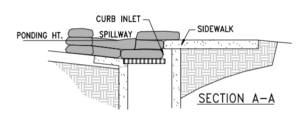
STABILIZED CONSTRUCTION ENTRANCE

NTS

RUMBLE STRIPS MAY BE USED AS AN ALTERNATIVE SUBJECT TO THE APPROVAL OF THE CITY PRIOR TO INSTALLATION

4





SECTION A–A

CONSTRUCTION SPECIFICATIONS:

1. PLACE THE BARRIERS ON GENTLY SLOPING STREETS WHERE WATER CAN POND.
2. THE BARRIERS MUST ALLOW FOR OVERFLOW FROM A SEVERE STORM EVENT. SLOPE RUNOFF SHALL BE ALLOWED TO FLOW OVER BLOCKS AND GRAVEL AND NOT BE BYPASSED OVER THE CURB. A SPILLWAY SHALL BE CONSTRUCTED WITH THE SANDBAG STRUCTURES TO ALLOW OVERFLOW.
3. THE SANDBAG SHOULD BE OF WOVEN-TYPE GEOTEXTILE FABRIC.
4. THE SANDBAGS SHALL BE FILLED WITH 3/4 INCH (19 MM) DRAIN ROCK OR 1/4 INCH (6 MM) PEA GRAVEL.
5. THE SANDBAGS SHALL BE PLACED IN A CURVED ROW FROM THE TOP OF CURB AT LEAST 3 FEET (0.9 M) INTO THE STREET. THE ROW SHOULD BE CURVED AT THE ENDS, POINTING UPHILL.
6. SEVERAL LAYERS OF BAGS SHOULD BE OVERLAPPED AND PACKED TIGHTLY.
7. LEAVE A ONE-SANDBAG GAP IN THE TOP ROW TO ACT AS A SPILLWAY.

FOR BLOCK AND GRAVEL TYPE BARRIERS:

8. PLACE TWO CONCRETE BLOCKS ON THEIR SIDES PERPENDICULAR TO THE CURB AT EITHER END OF THE INLET OPENING. THESE WILL SERVE AS SPACER BLOCKS.
9. PLACE CONCRETE BLOCKS ON THEIR SIDES ACROSS THE FRONT OF THE INLET AND ABUTTING THE SPACER BLOCKS. THE OPENINGS IN THE BLOCKS SHOULD FACE OUTWARD, NOT UPWARD.
10. CUT A 2 BY 4 INCH (51 BY 102 MM) STUD THE LENGTH OF THE CURB INLET PLUS THE WIDTH OF THE TWO SPACER BLOCKS. PLACE THE STUD THROUGH THE OUTER HOLE OF EACH SPACER BLOCK TO HELP KEEP THE FRONT BLOCKS IN PLACE.
11. PLACE WIRE MESH OVER THE OUTSIDE VERTICAL FACE (OPEN ENDS) OF THE CONCRETE BLOCKS TO PREVENT STONE FROM BEING WASHED THROUGH THE BLOCKS.
12. USE CHICKEN WIRE, HARDWARE CLOTH WITH 1/2 INCH (13 MM) OPENINGS, OR FILTER FABRIC. REFER TO APPENDIX – GEOTEXTILES/GEOSYNTHETICS.
13. PLACE ¾ – 1⅓ INCH (19-34 MM) GRAVEL AGAINST THE WIRE TO THE TOP OF THE BARRIER.

INSPECTION AND MAINTENANCE:

14. INSPECT AND CLEAN BARRIER DURING AND AFTER EACH SIGNIFICANT STORM AND REMOVE SEDIMENT FROM BEHIND SANDBAG STRUCTURE AFTER EVERY STORM.
15. ANY SEDIMENT AND GRAVEL SHALL BE IMMEDIATELY REMOVED FROM THE TRAVELED WAY OF ROADS.
16. THE REMOVED SEDIMENT SHALL BE PLACED WHERE IT CANNOT ENTER A STORM DRAIN, STREAM, OR BE TRANSPORTED OFF SITE.
17. IF THE GRAVEL BECOMES CLOGGED WITH SEDIMENT, IT MUST BE CAREFULLY REMOVED FROM THE INLET AND EITHER CLEARED OR REPLACED.

CURB INLET PROTECTION

NTS

3

BY		REVISION	DATE
DD	7	PLAN REVIEW COMMENT REVISIONS	5/14/2025
DD	6	PLAN REVIEW COMMENT REVISIONS	1/10/2025

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TEL (831) 426-5313
FAX (831) 426-1763
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Exhibit D

PRELIMINARY

EROSION CONTROL NOTES AND DETAILS

PAUL SWEET ROAD

3500 PAUL SWEET ROAD, SANTA CRUZ, CALIFORNIA

APN 025-013-37

DESIGN DEVELOPMENT

DATE	DESIGN	DRAWN
05/17/24	DD	DD

SHEET C4.0

JOB NO. 23026

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ENVIRONMENTAL PLANNING
COUNTY OF SANTA CRUZ
STATE OF CALIFORNIA

REVIEWED BY: _____ DATE _____

APPROVED BY: _____ DATE _____

PREPARATION OF THIS EROSION CONTROL PLAN COMPLETED UNDER THE DIRECTION OF:

RICHARD TOU, QSD, #001144
IFLAND ENGINEERS, INC.
5300 SOQUEL AVENUE, SUITE #101
SANTA CRUZ, CA. 95062
(831) 427-0405
rdtourdot@iflandengineers.com

NOTES:
1. SEE EROSION CONTROL NOTES AND DETAILS SHEET AS PART OF THIS PLAN SET.

LEGEND

- FIBER ROLLS PER NOTE 1
- DIRT STOCKPILE LOCATION PER NOTE 1
- PORTABLE TOILET
- CATCH BASIN PROTECTION PER NOTE 1
- CURB INLET PROTECTION PER NOTE 1
- STABILIZED CONSTRUCTION ENTRANCE PER NOTE 1

APN 025-011-04

PAUL SWEET ROAD

TRANSFORMER, BY OTHERS

APN 025-013-38

INSTALL CONCRETE WASHOUT. CONTRACTOR MAY USE PLASTIC TUBS AND RELOCATE ON-SITE AS NECESSARY, 20' MIN. FROM DRAIN STRUCTURES

PODIUM BUILDING

APN 025-013-34

GRAPHIC SCALE: 1 INCH = 10 FEET (10' 0 5' 10' 20')

PRELIMINARY

NOT FOR CONSTRUCTION

JOB NO. 23026

SHEET C4.1

APN 025-013-37
DESIGN DEVELOPMENT

DATE	DESIGN	DRAWN
05/17/24	DD	DD

EROSION CONTROL PLAN

PAUL SWEET ROAD

3500 PAUL SWEET ROAD, SANTA CRUZ, CALIFORNIA

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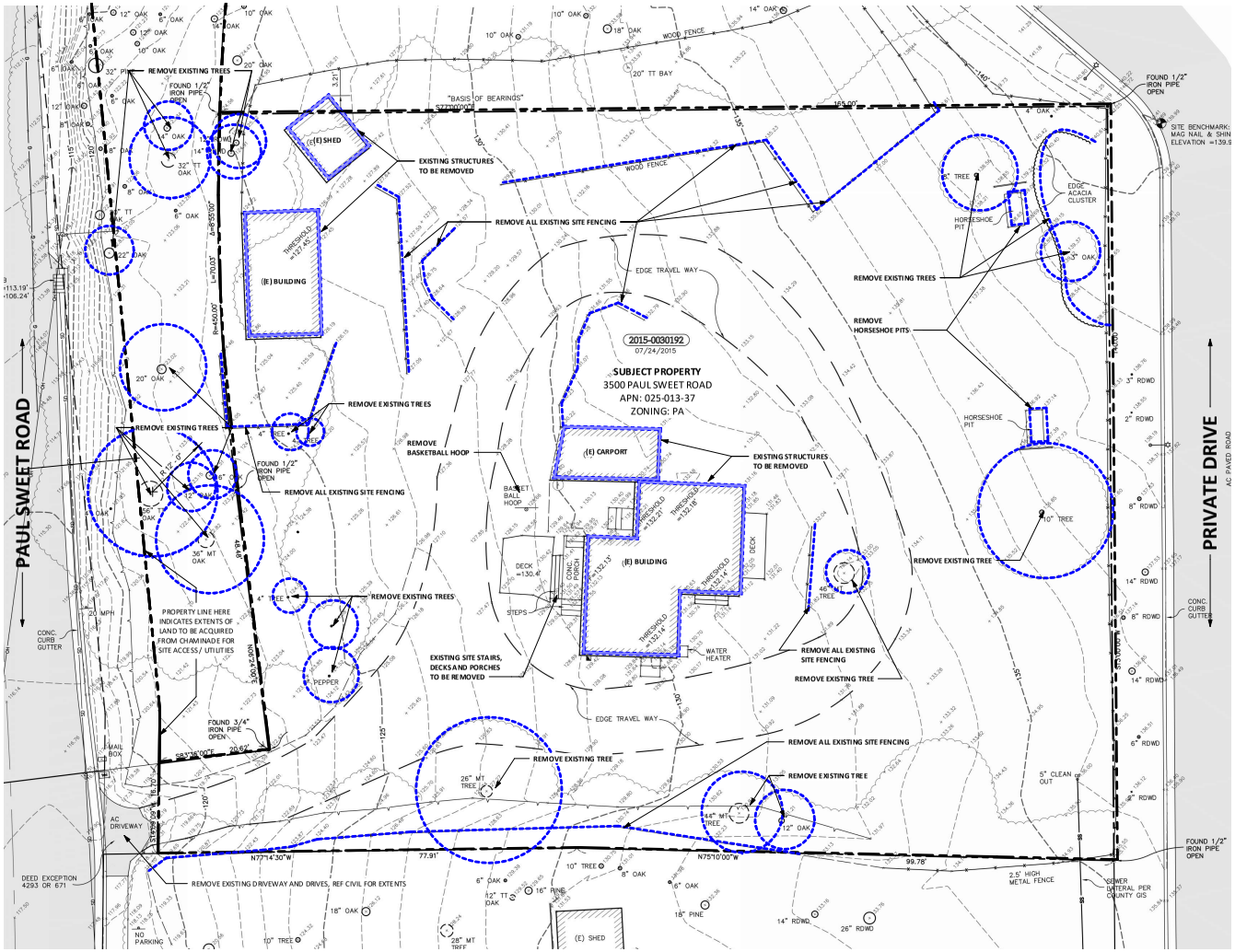
BY	REVISION	DATE
DD	2 PLAN REVIEW COMMENT REVISIONS	5/14/2025
DD	1 PLAN REVIEW COMMENT REVISIONS	1/15/2025

Exhibit D



1 EXISTING SITE DEMOLITION PLAN
1" = 10'-0"

DEMO SITE PLAN NOTES

1. SEE G-SERIES SHEETS FOR GENERAL NOTES AND PROJECT INFORMATION
2. REFERENCE LAND SURVEY FOR SITE ELEVATIONS, SLOPES AND EXISTING CONDITIONS
3. SEWER LATERAL ABANDONMENT PERMIT MUST BE ACQUIRED FROM THE SANITATION DISTRICT AND COMPLETED PRIOR TO DEMOLITION OF THE STRUCTURES.

workbench
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Exhibit D

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SANTA CRUZ, CA 95065

LICENSED ARCHITECT JAY HOWARD CALIFORNIA
NOT FOR CONSTRUCTION

NOT FOR CONSTRUCTION

ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
0	DRG SUBMITTAL	01.20.24
1	SB330	03.19.24
2	SB330 - 6 STORY	04.18.24
3	PLANNING SUBMITTAL	06.06.24
4	PLANNING SUBMITTAL	09.16.24

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	OH
Checked by	EB
Scale	As indicated

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TRUE NORTH

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DEMO SITE PLAN

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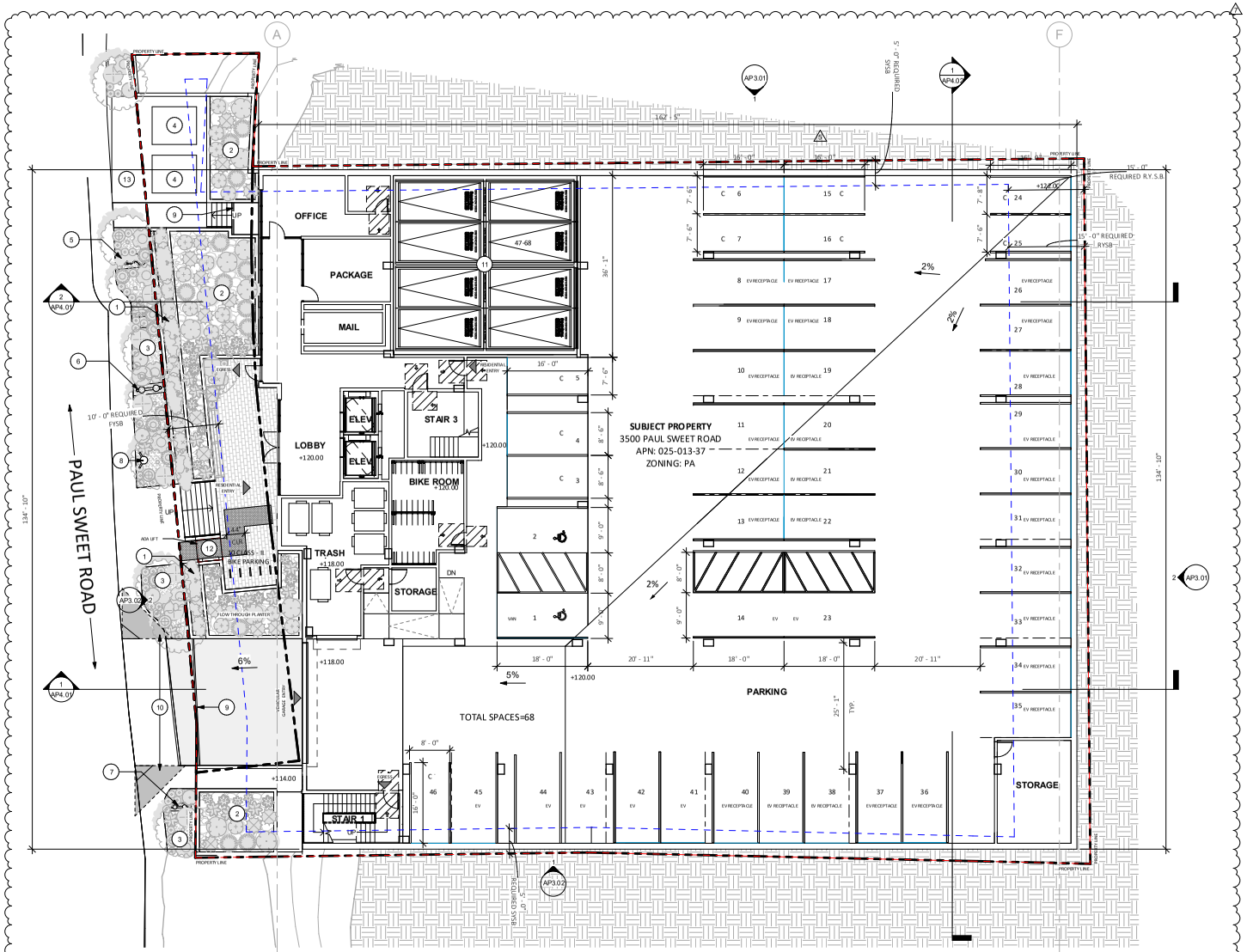

1 SITE PLAN - PLANNING
1" = 10'-0"

SITE PLAN NOTES

1. SEE SHEET G SHEETS FOR GENERAL NOTES AND PROJECT INFORMATION.
2. ADJACENT BUILDING HEIGHTS ARE APPROXIMATE AND ARE TAKEN FROM ADJACENT GRADE ELEVATIONS.
3. REFERENCE LAND SURVEY FOR SITE ELEVATIONS, SLOPES AND EXISTING SITE CONDITIONS.

SITE PLAN LEGEND

= REQUIRED SETBACK
= PROPOSED SETBACK
(WHERE DEVIATES FROM REQUIRED)

44" EXTERIOR EGRESS PATH TO ROW WITH TRAVEL WIDTH REQUIRED (PROVIDE MINIMUM ILLUMINATION FOR EXISTING-REFER TO ELECTRICAL DRAWINGS).

KEYNOTE SCHEDULE - SITE PLAN

KEYNOTE	MATERIAL
1	LANDSCAPE PLANTER
2	FLOW THROUGH PLANTER
3	LANDSCAPE
4	TRANSFORMER
5	FIRE CONNECTION PER CIVIL PLANS
6	DOMESTIC BACKFLOW PER CIVIL PLANS
7	IRRIGATION BACKFLOW PER CIVIL PLANS
8	FIRE HYDRANT PER CIVIL PLANS
9	TRENCH DRAIN PER CIVIL PLANS
10	VISION TRIANGLES
11	CAR STACKER PARKING
12	ADA CHAIR LIFT
13	TRANSFORMER PAD

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3500 PAUL SWEET ROAD
SANTA CRUZ, CA 95065

LICENSED ARCHITECT JAY OH CALIFORNIA
NOT FOR CONSTRUCTION
NOT FOR CONSTRUCTION

ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
0	DRG SUBMITTAL	01.20.24
1	SB330	03.19.24
2	SB330 - 6 STORY	04.18.24
3	PLANNING SUBMITTAL	06.06.24
4	PLANNING SUBMITTAL	09.16.24
5	RESPONSE TO PLANNING COMMENTS	01.30.25
7	PLANNING REVISION	05.15.25

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	OH
Checked by	EB
Scale	As indicated

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PROPOSED SITE PLAN

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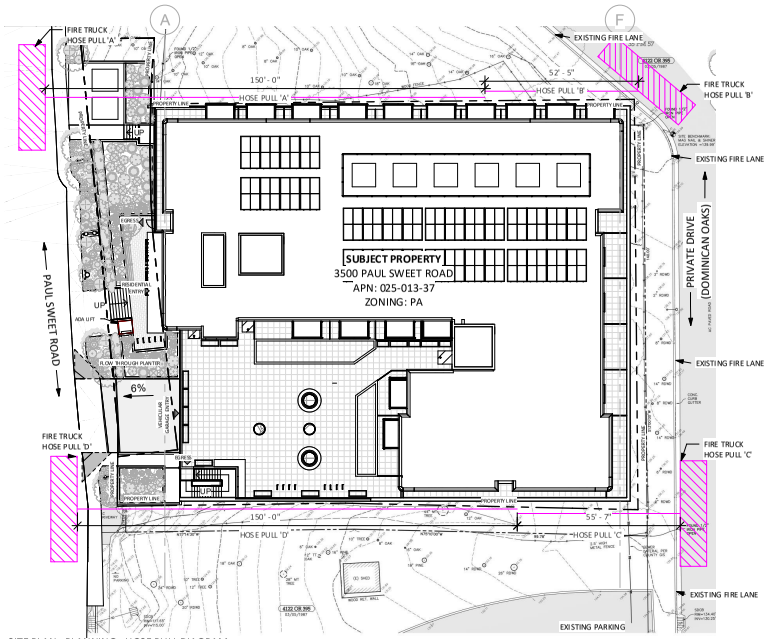
FIRE ACCESS DIAGRAM



1 SITE PLAN - PLANNING - HOSE PULL DIAGRAM
1" = 20'-0"

FIRE DEPARTMENT NOTES

1. THE COUNTY OF SANTA CRUZ EMERGENCY SERVICES DEPARTMENT/ADDRESSING MUST APPROVE OR ASSIGN AN ADDRESS BEFORE FIRE DISTRICT APPROVAL IS OBTAINED.
2. THESE PLANS ARE IN COMPLIANCE WITH THE CALIFORNIA BUILDING & FIRE CODES (2022) AND CENTRAL FIRE PROTECTION DISTRICT AMENDMENTS.
3. THE FIRE ALARM SYSTEM REQUIRES A SEPARATE PERMIT AND SUBMITTAL. CFC 907.1
4. THE FIRE SPRINKLER SYSTEM REQUIRES A SEPARATE PERMIT AND SUBMITTAL. CFC 903.1.
5. THE BUILDING SHALL BE PROTECTED BY AN APPROVED AUTOMATIC SPRINKLER SYSTEM COMPLYING WITH THE CURRENT EDITION OF NFPA 13 CURRENTLY ADOPTED IN CHAPTER 35 OF THE CBC.
6. NEW/UPGRADED HYDRANTS, WATER STORAGE TANKS, AND/OR UPGRADED ROADWAYS SHALL BE INSTALLED PRIOR TO AND DURING TIME OF CONSTRUCTION (CFC 901.3)
7. IF THE NUMBER OF CEILING SPRINKLERS IS GREATER THAN THE NUMBER OF SHELL SPRINKLERS, OR IF MORE THAN ONE DROP IS SUPPLIED FROM ANY 1" OUTLET, THE SYSTEM SHALL BE RECALCULATED.
8. THE DESIGNER/INSTALLER SHALL SUBMIT TWO (2) SETS OF PLANS AND CALCULATIONS FOR THE AUTOMATIC SPRINKLER SYSTEM TO THIS AGENCY FOR APPROVAL. THE FIRE SPRINKLER SYSTEM DRAWINGS MUST BE PREPARED AND SUBMITTED FOR APPROVAL BY A CALIFORNIA STATE LICENSED CONTRACTOR (CLASS A, OR C-16)
9. AN UNDERGROUND FIRE PROTECTION SYSTEM WORKING DRAWING MUST BE PREPARED BY THE DESIGNER/INSTALLER. THE PLANS SHALL COMPLY WITH THE UNDERGROUND FIRE PROTECTION SYSTEM INSTALLATION POLICY. UNDERGROUND PLAN SUBMITTAL AND PERMIT WILL BE ISSUED TO A CLASS A, C-16 OR C-34 CONTRACTOR.
10. A 30-FOOT CLEARANCE SHALL BE MAINTAINED WITH NON-COMBUSTIBLE VEGETATION AROUND ALL STRUCTURES OR TO THE PROPERTY LINE WHICHEVER IS A SHORTER DISTANCE.
    A. EXCEPTION: SINGLE SPECIMENS OF TREES, ORNAMENTAL SHRUBBERY OR SIMILAR PLANTS USED AS GROUND COVERS, PROVIDED THEY DO NOT FORM A MEANS OF RAPIDLY TRANS-MITTING FIRE FROM NATIVE GROWTH TO ANY STRUCTURE.
11. A 100-FOOT CLEARANCE SHALL BE MAINTAINED AROUND AND ADJACENT TO THE BUILDING OR STRUCTURE TO PROVIDE ADDITIONAL FIRE PROTECTION OR FIRE BREAK BY REMOVING ALL BRUSH, FLAMMABLE VEGETATION, OR COMBUSTIBLE GROWTH
    A. EXCEPTION: SINGLE SPECIMENS OF TREES, ORNAMENTAL SHRUBBERY OR SIMILAR PLANTS USED AS GROUND COVERS, PRO-VIDED THEY DO NOT FORM A MEANS OF RAPIDLY TRANS-MITTING FIRE FROM NATIVE GROWTH TO ANY STRUCTURE
12. THE JOB COPIES OF THE BUILDING AND FIRE SYSTEMS PLANS AND PERMITS MUST BE ON-SITE DURING INSPECTIONS.
13. THE ROOF COVERING SHALL BE NO LESS THAN CLASS "B" RATED ROOF.
14. HOSE PULL CLEARANCE SHALL MEET A MAXIMUM OF 150 FEET, PER CENTRAL FIRE.
15. REQUIRED FIRE FLOW PER CFC APENDIX B/BB TABLE B105.1(2) & B105.2 WITH AN NFPA 13 FIRE SPRINKLER SYSTEM COMPLIANT WITH SECTION 903.3.1.1 OF THE CALIFORNIA FIRE CODE
    TYPE 1-A= 21,776 SF = (1,500 GPM X .25)= 375 GPM FOR 120 MIN .
    REQUIRED FIRE FLOW SHALL BE 1,000 GPM FOR 120 MIN
    TYPE IIIA= 70,141 SF = (3, 750 GPM X .25)= 937.5 GPM FOR 180 MIN.
    REQUIRED FIRE FLOW SHALL BE 1,000 GPM FOR 180 MIN

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LICENSED ARCHITECT JAY PUTMAN CALIFORNIA
NOT FOR CONSTRUCTION
NOT FOR CONSTRUCTION

ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
7	PLANNING REVISION	05.15.25

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	JP
Checked by	OH
Scale	As indicated

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HOSE PULL DIAGRAM

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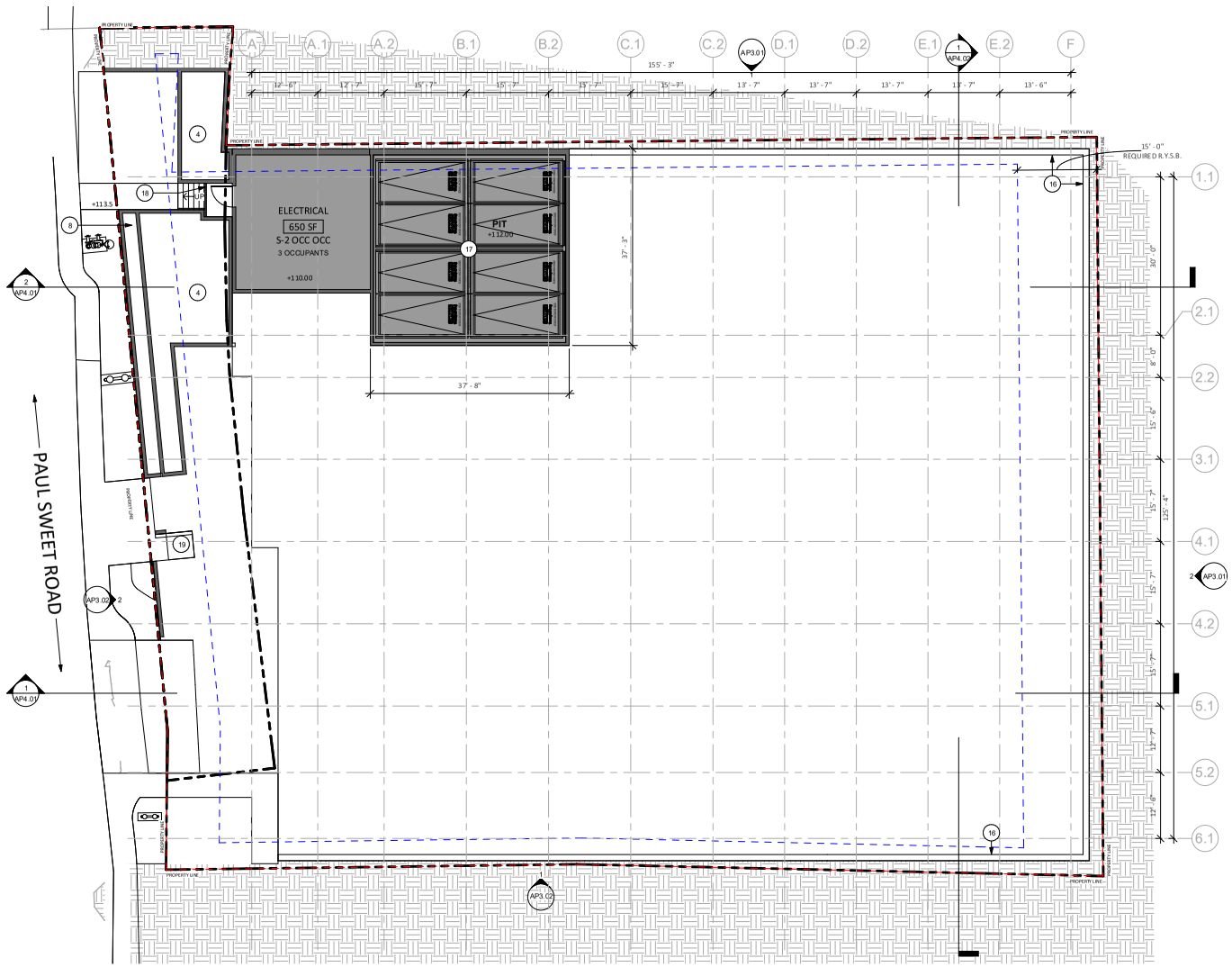

1 LOWER LEVEL -PLANNING
1" = 10'-0"

FLOOR PLAN NOTES

1. SEE SHEET G-SHEETS FOR GENERAL NOTES AND PROJECT INFORMATION.
2. REFER TO CIVIL DRAWINGS FOR ADDITIONAL SITE INFORMATION.
3. ALL UNITS SHALL BE ADAPTABLE PER CBC CH 11A WITH BATHROOMS PER 1134A.2 OPTION 2 UNLESS OTHERWISE NOTED.

UNIT MIX & BONUS DENSITY

UNIT TYPE	COUNT
	5
STUDIO	30
JR 1 BED	55
1 BED	5
2 BED	15
	110

SETBACK LEGEND

= REQUIRED SETBACK
= PROPOSED SETBACK
(WHERE DEVIATES FROM REQUIRED)

FLOOR PLAN KEYED NOTES

KEYNOTE SCHEDULE - FLOOR PLAN	
KEYNOTE	MATERIAL
1	ACCESSIBLE PARKING STALL
2	CLASS-I BICYCLE PARKING
3	CLASS-II BICYCLE PARKING
4	BIOFILTRATION PLANTER, SEE CIVIL
5	DASH INDICATES OVERHANG ABOVE
6	MAILBOXES
7	STRUCTURAL COLUMN/ELEMENT (INDICATIVE)
8	LANDSCAPE PLANTER
9	PRIVATE TERRACE
10	PLANTER BENCH TYP., SEE LANDSCAPE
11	STAIRS TO PUBLIC TERRACE
12	PRIVATE BALCONY
13	JULIET BALCONY
14	ROLLING OVERHEAD DOOR / VEHICLE ENTRY GATE
15	SLOPING ENTRANCE ACCESS
16	FOUNDATION WALL
17	CAR STACKER PARKING
18	TRENCH DRAIN
19	ADA CHAIR LIFT
20	METAL FENCE AND GATE

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PROJECT NORTH

workbench
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SANTA CRUZ, CA 95060
WORKBENCHBUILT.COM
P: 831.227.2217

Exhibit D

3500 PAUL SWEET ROAD

3500 PAUL SWEET ROAD
SANTA CRUZ, CA 95065

LICENSED ARCHITECT JAY PATEL CALIFORNIA
NOT FOR CONSTRUCTION

NOT FOR CONSTRUCTION

ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
0	DRB SUBMITTAL	01.20.24
1	SB330	03.19.24
2	SB330 - 6 STORY	04.18.24
3	PLANNING SUBMITTAL	06.06.24
4	PLANNING SUBMITTAL	09.16.24

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	JP
Checked by	EB
Scale	As indicated

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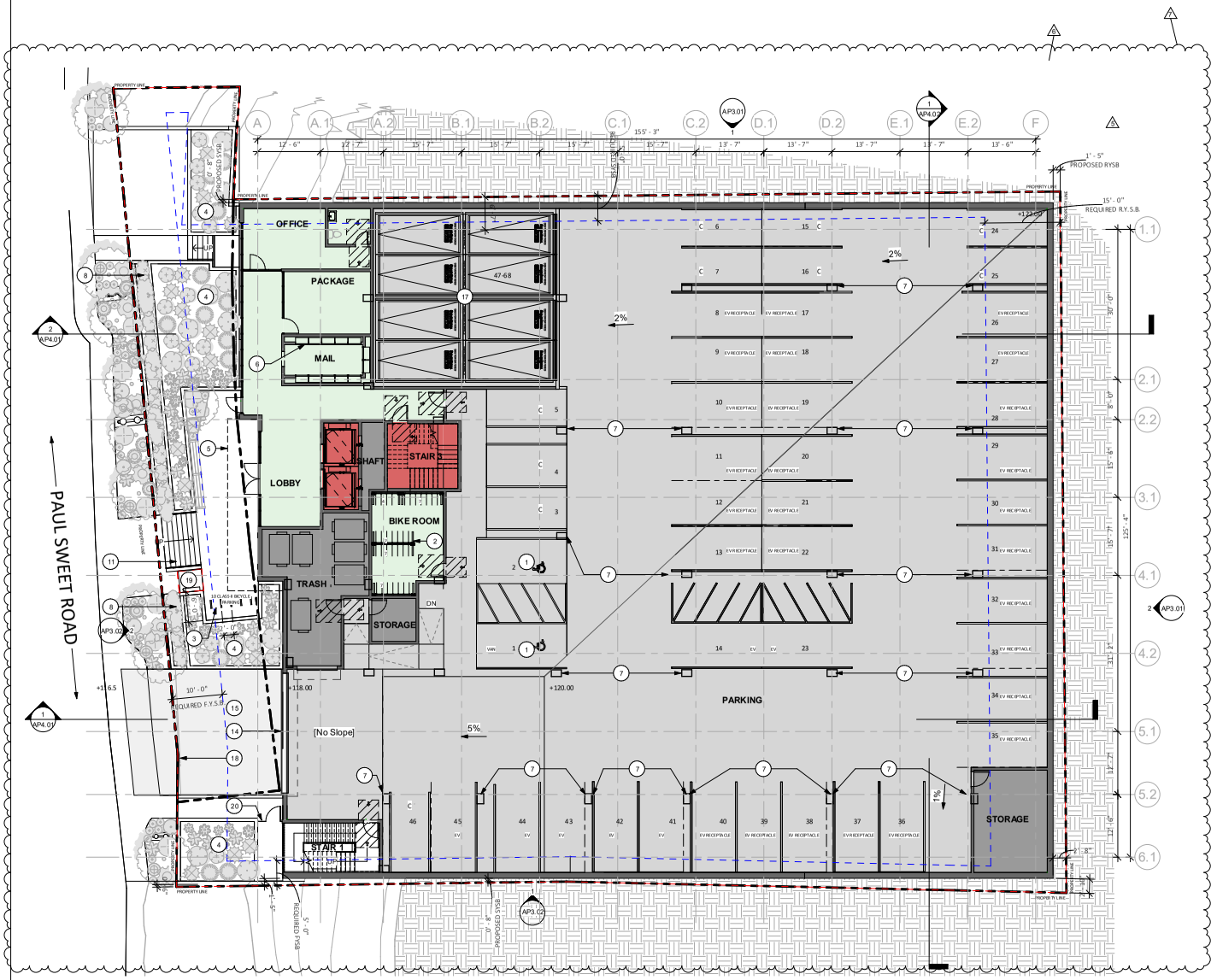
LOWER LEVEL PLAN

AP1.00

5/15/2025 2:26:33 PM



1 LEVEL 1.5 - PLANNING
1" = 10'-0"

FLOOR PLAN NOTES

1. SEE SHEET G-SHEETS FOR GENERAL NOTES AND PROJECT INFORMATION.
2. REFER TO CIVIL DRAWINGS FOR ADDITIONAL SITE INFORMATION.
3. ALL UNITS SHALL BE ADAPTABLE PER CBC CH 11A WITH BATHROOMS PER 1134A.2 OPTION 2 UNLESS OTHERWISE NOTED.

UNIT MIX & BONUS DENSITY

UNIT TYPE	COUNT
	5
STUDIO	30
JR 1 BED	55
1 BED	5
2 BED	15
	110

SETBACK LEGEND

= REQUIRED SETBACK
= PROPOSED SETBACK
(WHERE DEVIATES FROM REQUIRED)

FLOOR PLAN KEYED NOTES

KEYNOTE SCHEDULE - FLOOR PLAN

KEYNOTE	MATERIAL
1	ACCESSIBLE PARKING STALL
2	CLASS-I BICYCLE PARKING
3	CLASS-II BICYCLE PARKING
4	BIOFILTRATION PLANTER, SEE CIVIL
5	DASH INDICATES OVERHANG ABOVE
6	MAILBOXES
7	STRUCTURAL COLUMN/ELEMENT (INDICATIVE)
8	LANDSCAPE PLANTER
9	PRIVATE TERRACE
10	PLANTER BENCH TYP., SEE LANDSCAPE
11	STAIRS TO PUBLIC TERRACE
12	PRIVATE BALCONY
13	JULIET BALCONY
14	ROLLING OVERHEAD DOOR / VEHICLE ENTRY GATE
15	SLOPING ENTRANCE ACCESS
16	FOUNDATION WALL
17	CAR STACKER PARKING
18	TRENCH DRAIN
19	ADA CHAIR LIFT
20	METAL FENCE AND GATE

TRUE NORTH
PROJECT NORTH

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LICENSED ARCHITECT JAY LEE CALIFORNIA
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ISSUES/ REVISIONS

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4	PLANNING SUBMITTAL	09.16.24
5	RESPONSE TO PLANNING COMMENTS	01.30.25
6	PLANNING REVISION	03.04.25
7	PLANNING REVISION	05.15.25

APN	025-013-37
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Drawn by	OH/LB
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PROPOSED FLOOR PLAN - LEVEL 1

AP1.01

5/15/2025 2:26:52 PM

1 LEVEL 2 - PLANNING
1" = 10'-0"

FLOOR PLAN NOTES

1. SEE SHEET G-SHEETS FOR GENERAL NOTES AND PROJECT INFORMATION.
2. REFER TO CIVIL DRAWINGS FOR ADDITIONAL SITE INFORMATION.
3. ALL UNITS SHALL BE ADAPTABLE PER CBC CH 11A WITH BATHROOMS PER 1134A.2 OPTION 2 UNLESS OTHERWISE NOTED.

UNIT MIX & BONUS DENSITY

UNIT TYPE	COUNT
	5
STUDIO	30
JR 1 BED	55
1 BED	5
2 BED	15
	110

SETBACK LEGEND

= REQUIRED SETBACK
= PROPOSED SETBACK
(WHERE DEVIATES FROM REQUIRED)

FLOOR PLAN KEYED NOTES

KEYNOTE SCHEDULE - FLOOR PLAN	
KEYNOTE	MATERIAL
1	ACCESSIBLE PARKING STALL
2	CLASS-I BICYCLE PARKING
3	CLASS-II BICYCLE PARKING
4	BIOFILTRATION PLANTER, SEE CIVIL
5	DASH INDICATES OVERHANG ABOVE
6	MAILBOXES
7	STRUCTURAL COLUMN/ELEMENT (INDICATIVE)
8	LANDSCAPE PLANTER
9	PRIVATE TERRACE
10	PLANTER BENCH TYP., SEE LANDSCAPE
11	STAIRS TO PUBLIC TERRACE
12	PRIVATE BALCONY
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14	ROLLING OVERHEAD DOOR / VEHICLE ENTRY GATE
15	SLOPING ENTRANCE ACCESS
16	FOUNDATION WALL
17	CAR STACKER PARKING
18	TRENCH DRAIN
19	ADA CHAIR LIFT
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LICENSED ARCHITECT JAY OH CALIFORNIA
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ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
0	DRB SUBMITTAL	01.20.24
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APN	025-013-37
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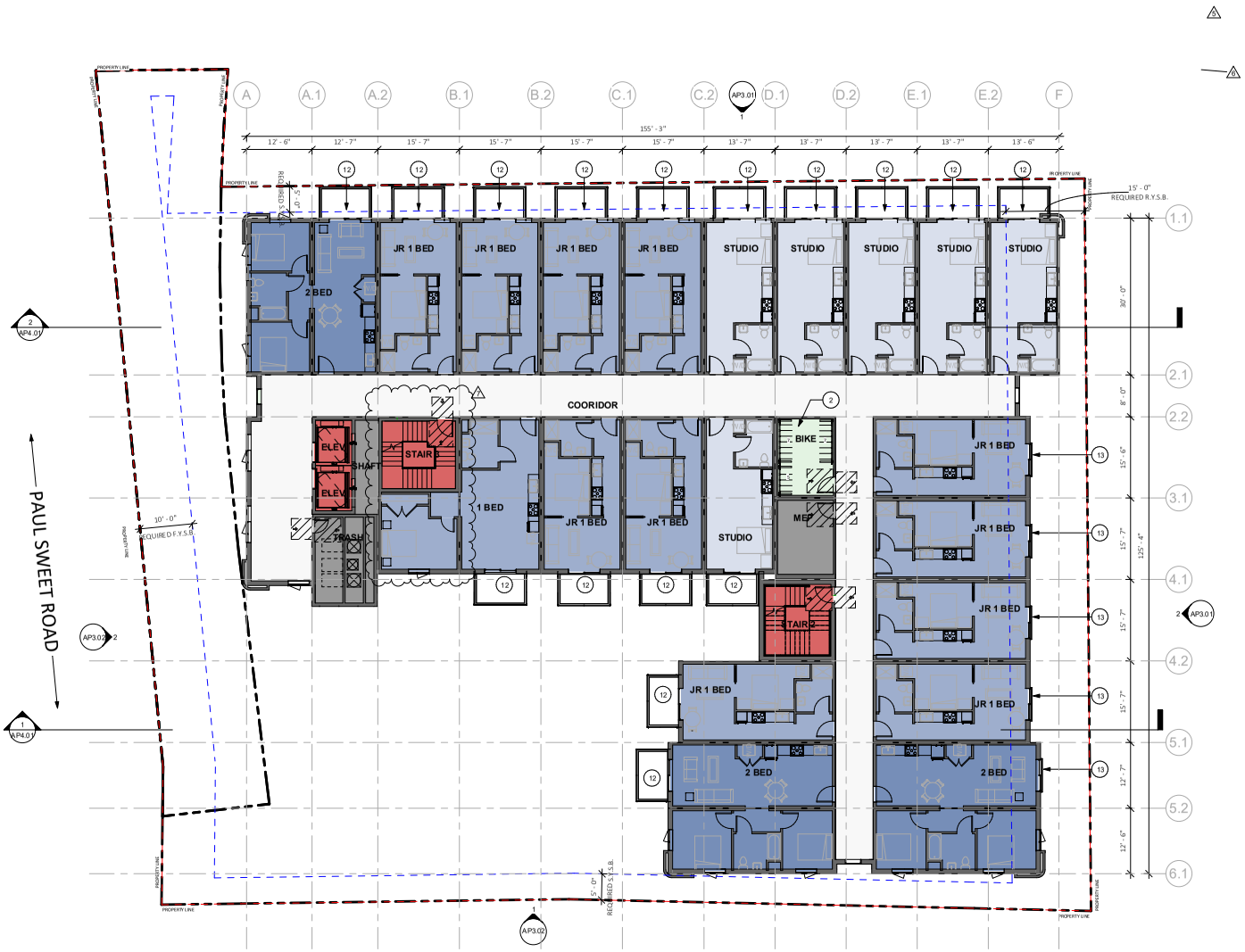
PROPOSED FLOOR PLAN - LEVEL 2

AP1.02

5/15/2025 2:26:57 PM



1 LEVEL 3-6 PLANNING
1" = 10'-0"

FLOOR PLAN NOTES

1. SEE SHEET G-SHEETS FOR GENERAL NOTES AND PROJECT INFORMATION.
2. REFER TO CIVIL DRAWINGS FOR ADDITIONAL SITE INFORMATION.
3. ALL UNITS SHALL BE ADAPTABLE PER CBC CH 11A WITH BATHROOMS PER 1134A.2 OPTION 2 UNLESS OTHERWISE NOTED.

UNIT MIX & BONUS DENSITY

UNIT TYPE	COUNT
	5
STUDIO	30
JR 1 BED	55
1 BED	5
2 BED	15
	110

SETBACK LEGEND

= REQUIRED SETBACK
= PROPOSED SETBACK
(WHERE DEVIATES FROM REQUIRED)

FLOOR PLAN KEYED NOTES

KEYNOTE SCHEDULE - FLOOR PLAN

KEYNOTE	MATERIAL
1	ACCESSIBLE PARKING STALL
2	CLASS-I BICYCLE PARKING
3	CLASS-II BICYCLE PARKING
4	BIOFILTRATION PLANTER, SEE CIVIL
5	DASH INDICATES OVERHANG ABOVE
6	MAILBOXES
7	STRUCTURAL COLUMN/ELEMENT (INDICATIVE)
8	LANDSCAPE PLANTER
9	PRIVATE TERRACE
10	PLANTER BENCH TYP., SEE LANDSCAPE
11	STAIRS TO PUBLIC TERRACE
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18	TRENCH DRAIN
19	ADA CHAIR LIFT
20	METAL FENCE AND GATE

TRUE NORTH
PROJECT NORTH

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LICENSED ARCHITECT JAY LEE CALIFORNIA
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ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
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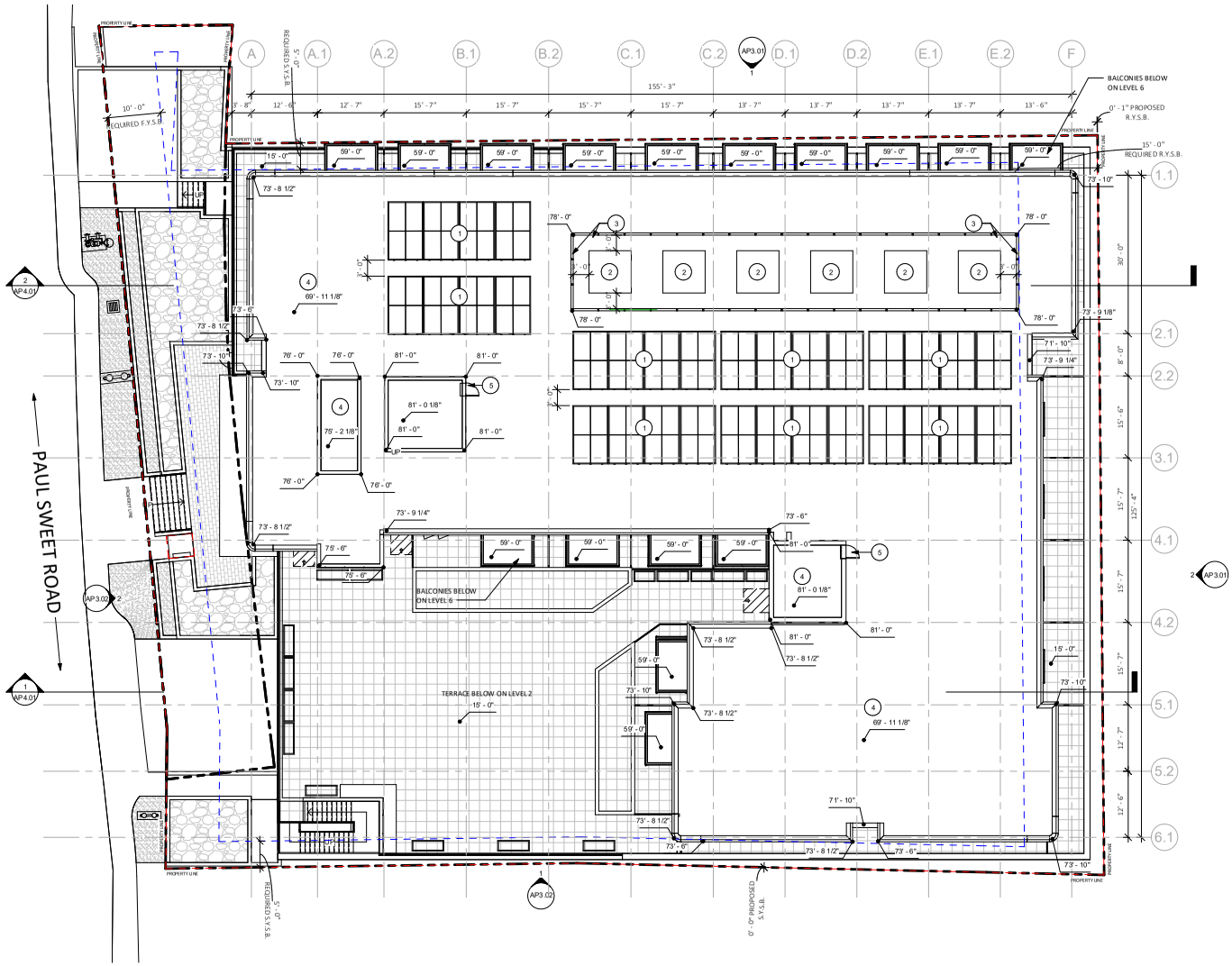
PROPOSED FLOOR PLAN - LEVEL 3, 4, 5 & 6

AP1.03

5/15/2025 2:27:01 PM



1 ROOF - PLANNING
1" = 10'-0"

ROOF PLAN NOTES

1. SEE SHEET G-SHEETS FOR GENERAL NOTES AND PROJECT INFORMATION

UNIT MIX

UNIT TYPE	COUNT
	5
STUDIO	30
JR 1 BED	55
1 BED	5
2 BED	15
	110

SETBACK LEGEND

= REQUIRED SETBACK
= PROPOSED SETBACK
(WHERE DEVIATES FROM REQUIRED)

ROOF PLAN KEYED NOTES

KEYNOTE SCHEDULE - ROOF PLAN

KEYNOTE	MATERIAL
1	SOLAR PHOTOVOLTAIC ARRAY (INDICATIVE)
2	ROOFTOP MECHANICAL EQUIPMENT (INDICATIVE)
3	ROOFTOP SCREEN (INDICATIVE)
4	MEMBRANE ROOF (INDICATIVE)
5	ROOF ACCESS DOOR

TRUE NORTH

PROJECT NORTH

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ISSUES/ REVISIONS

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PROPOSED ROOF PLAN

AP1.04

5/15/2025 2:27:05 PM

1 NORTH ELEVATION PLANNING
3/32" = 1'-0"

2 EAST ELEVATION PLANNING
3/32" = 1'-0"

ELEVATIONS GENERAL NOTES

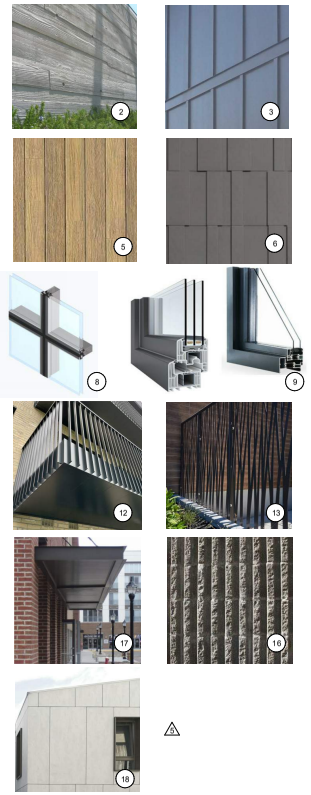
1. PROPERTY LINES ARE SHOWN RELATIVE TO THE ELEVATION, REFER TO PLAN DRAWINGS FOR MORE INFORMATION ON PROPERTY LINE LOCATIONS AND DIMENSIONS.
2. CURBS AND STREETS ARE SHOWN RELATIVE TO THE ELEVATION VIEW, REFER TO LAND SURVEY FOR EXISTING CURB, GUTTER, AND STREET INFORMATION.

ELEVATION KEYED NOTES

KEYNOTE SCHEDULE - EXTERIOR ELEVATION

KEYNOTE	MATERIAL
1	DRIVEWAY, REF CIVIL
2	BOARD FORMED CONCRETE OR TEXTURED FIBER CEMENT PANEL OR SIM.
3	VERTICAL BOARD AND BATTEN PATTERNED CEMENTITIOUS SIDING OR SIM., BATTEN SPACING VARIES
4	ROLLING OVERHEAD DOOR / VEHICLE ENTRY GATE
5	WOOD OR WOOD-LOOK CLADDING OR SIM.
6	GREY FIBER CEMENT PANEL OR STUCCO OR SIM.
7	ADA CHAIR LIFT
8	GLAZED ALUMINUM OR TIMBER CURTAIN WALL SYSTEM OR SIM.
9	ALUMINUM OR VINYL WINDOWS OR SIM.
10	PAINTED METAL BALCONY
11	JULIET BALCONY
12	PAINTED METAL RAILING
13	PATTERNED METAL SCREEN
14	ROOFTOP MECHANICAL EQUIPMENT
16	PLANTER / PLANTER BENCH
17	METAL CANOPY
18	TEXTURED FIBER CEMENT PANEL OR SIM.
19	ADDRESS TO COMPLY WITH FIRE DEPARTMENT REQUIREMENTS
20	RESIDENTIAL IDENTITY SIGNAGE UNDER SEPARATE PERMIT

MATERIALS LEGEND



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LICENSED ARCHITECT JAY BRAUN CALIFORNIA
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ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
0	DRG SUBMITTAL	01.20.24
1	SB330	03.19.24
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7	PLANNING REVISION	05.15.25

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PROPOSED ELEVATIONS

AP3.01

5/16/2025 1:50:14 PM

1 SOUTH ELEVATION PLANNING
3/32" = 1'-0"

2 WEST ELEVATION PLANNING
3/32" = 1'-0"

ELEVATIONS GENERAL NOTES

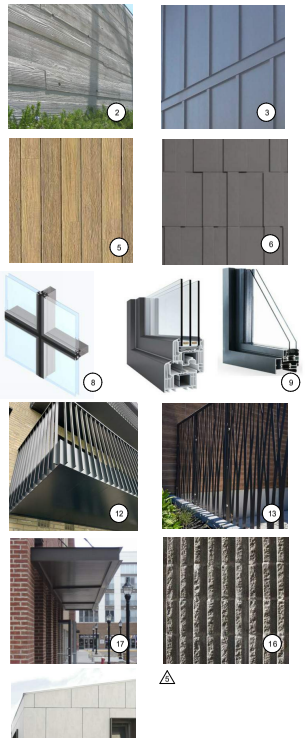
1. PROPERTY LINES ARE SHOWN RELATIVE TO THE ELEVATION, REFER TO PLAN DRAWINGS FOR MORE INFORMATION ON PROPERTY LINE LOCATIONS AND DIMENSIONS.
2. CURBS AND STREETS ARE SHOWN RELATIVE TO THE ELEVATION VIEW, REFER TO LAND SURVEY FOR EXISTING CURB, GUTTER, AND STREET INFORMATION.

ELEVATION KEYED NOTES

KEYNOTE SCHEDULE - EXTERIOR ELEVATION

KEYNOTE	MATERIAL
1	DRIVEWAY, REF CIVIL
2	BOARD FORMED CONCRETE OR TEXTURED FIBER CEMENT PANEL OR SIM.
3	VERTICAL BOARD AND BATTEN PATTERNED CEMENTITIOUS SIDING OR SIM., BATTEN SPACING VARIES
4	ROLLING OVERHEAD DOOR / VEHICLE ENTRY GATE
5	WOOD OR WOOD-LOOK CLADDING OR SIM.
6	GREY FIBER CEMENT PANEL OR STUCCO OR SIM.
7	ADA CHAIR LIFT
8	GLAZED ALUMINUM OR TIMBER CURTAIN WALL SYSTEM OR SIM.
9	ALUMINUM OR VINYL WINDOWS OR SIM.
10	PAINTED METAL BALCONY
11	JULIET BALCONY
12	PAINTED METAL RAILING
13	PATTERNED METAL SCREEN
14	ROOFTOP MECHANICAL EQUIPMENT
16	PLANTER / PLANTER BENCH
17	METAL CANOPY
18	TEXTURED FIBER CEMENT PANEL OR SIM.
19	ADDRESS TO COMPLY WITH FIRE DEPARTMENT REQUIREMENTS
20	RESIDENTIAL IDENTITY SIGNAGE UNDER SEPARATE PERMIT

MATERIALS LEGEND



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LICENSED ARCHITECT JAY BRANDT CALIFORNIA
NOT FOR CONSTRUCTION

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ISSUES/ REVISIONS

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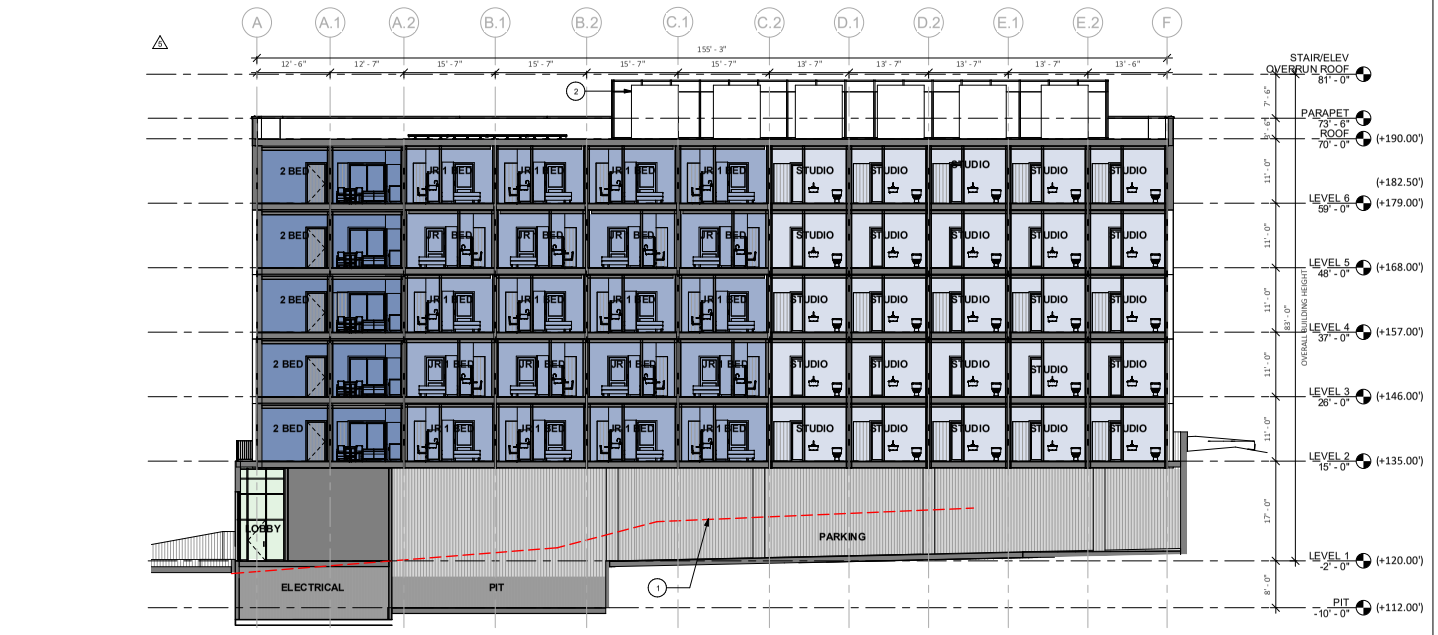
PROPOSED ELEVATIONS

AP3.02

5/16/2025 1:49:21 PM

1 BUILDING SECTION A
1" = 10'-0"



2 BUILDING SECTION B
1" = 10'-0"

BUILDING SECTION NOTES

1. SEE SHEET G-SHEETS FOR GENERAL NOTES AND PROJECT INFORMATION

KEYNOTE SCHEDULE - BUILDING SECTION	
KEYNOTE	MATERIAL
1	BEDROCK, SEE GEOTECHNICAL REPORT FOR MORE INFORMATION
2	ROOFTOP MECHANICAL EQUIPMENT

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SANTA CRUZ, CA 95065

LICENSED ARCHITECT JAY OLSON CALIFORNIA
NOT FOR CONSTRUCTION

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ISSUES/ REVISIONS

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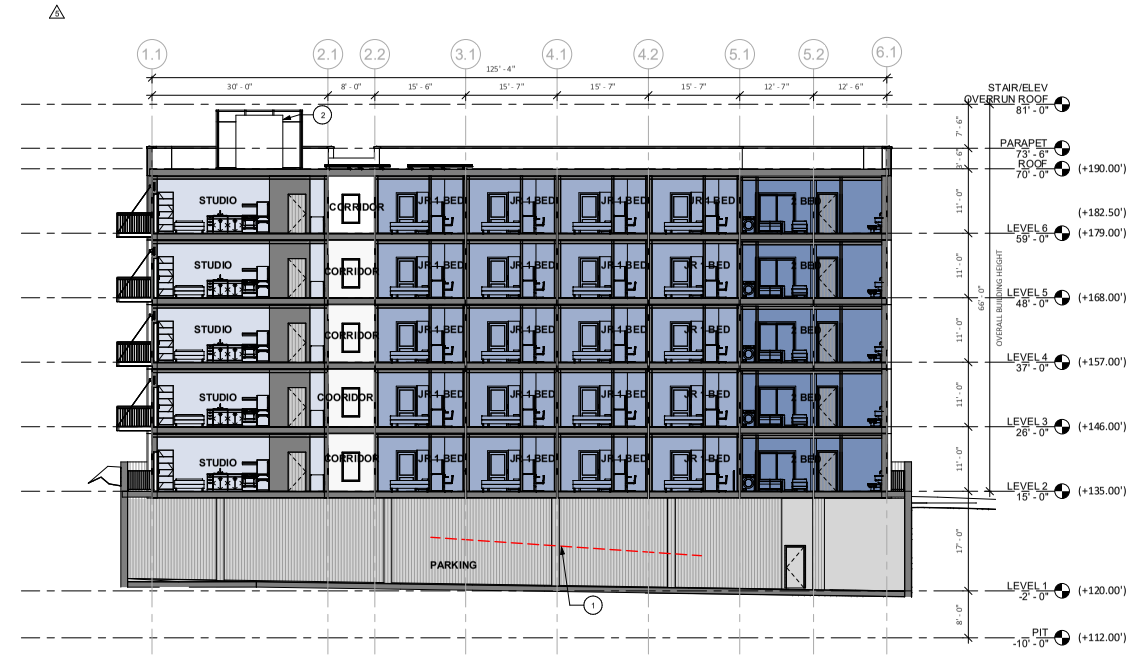
BUILDING SECTIONS

AP4.01

5/16/2025 2:11:14 PM



1 BUILDING SECTION C
1" = 10'-0"

BUILDING SECTION NOTES

1. SEE SHEET G-SHEETS FOR GENERAL NOTES AND PROJECT INFORMATION

KEYNOTE SCHEDULE - BUILDING SECTION	
KEYNOTE	MATERIAL
1	BEDROCK, SEE GEOTECHNICAL REPORT FOR MORE INFORMATION
2	ROOFTOP MECHANICAL EQUIPMENT

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LICENSED AP JAY CALIFORNIA
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ISSUES/ REVISIONS

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BUILDING SECTIONS

AP4.02

5/15/2025 2:27:44 PM

Page 1 Section Dimensions Car data
Page 2 Width dim. without door
Page 3 Width dim. with door Function Approach
Page 4 Load plan Installation
Page 5 Electrical installation Technical data
Page 6 To be performed by the customer Description

KLAUS multiparking

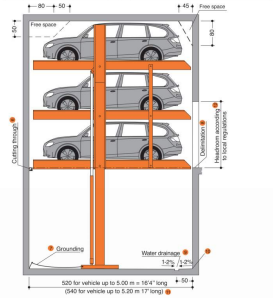
KLAUS Multiparking GmbH
Hermann-Krum-Straße 2
D-88319 Aitrach
Fon +49 (0) 7565 508-0
Fax +49 (0) 7565 508-88
info@multiparking.com
www.multiparking.com

PRODUCT DATA

multibase G63

2000 kg

Garage without door (basement garage)



Dimensions

All space requirements are minimum finished dimensions.

Tolerances for space requirements*: ±2 cm
Dimensions in cm.

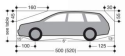
EB (single platform) = 3 vehicles
DB (double platform) = 6 vehicles

Suitable for

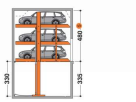
Standard passenger cars:
Limousine, station wagon, SUV, van according to clearance and maximal surface load.

	Standard	Special
width	190 cm	190 cm
weight	max. 2000 kg	max. 2500 kg
wheel load	max. 500 kg	max. 625 kg

Clearance profile

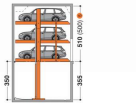


G63-330



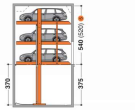
height	Car height upper	Car height middle	Car height lower
480	160	150	150

G63-350



height	Car height upper	Car height middle	Car height lower
510	160	160	160
(500)	150	160	160

G63-370



height	Car height upper	Car height middle	Car height lower
540	170	170	170
(530)	150	170	170

- Standard type
- Special system: maximum load (only EB) for extra charge.
- To follow the minimum finished dimensions, make sure to consider the tolerances according to VOB, part C (DIN 18330 and 18331) and the DIN 18202.
- Car width for platform width 230 cm. If wider platforms are used it is also possible to park wider cars.
- If a higher ceiling height is available higher cars can be parked.
- For dividing walls: cutting through 10 x 10 cm.
- Potential equalization from foundation grounding connection to system (provided by the customer).
- In compliance with DIN EN 14010, 10 cm wide yellow-black markings compliant to ISO 3864 must be applied by the customer to the edge of the pit in the entry area to mark the danger zone (see „load plan" page 4).
- Slope with drainage channel and sump.
- At the transition section between pit floor and walls no hollow mouldings/coves are possible. If hollow mouldings/coves are required, the systems must be designed smaller or the pits accordingly wider.
- For convenient use of your parking space and due to the fact that the cars keep becoming longer we recommend a pit length of 540 cm.
- Must be at least as high as the greatest car height + 5 cm.

MultiBase G63 | Item number 583.91.490-008 | Version 12.2016

Page 1 Section Dimensions Car data
Page 2 Width dim. without door
Page 3 Width dim. with door Function Approach
Page 4 Load plan Installation
Page 5 Electrical installation Technical data
Page 6 To be performed by the customer Description

Width dimensions for garage without door (basement garage)

Dividing walls

Single Platform (EB)

usable platform width	B1
230	260
240	270
250	280
260	290
270	300

Double Platform (DB)

usable platform width	B1
460	500
470	510
480	520
490	530
500	540

Single and Double Platform (EB + DB) – Example

usable platform width	B1
230 + 460	760
240 + 470	780
250 + 480	800
250 + 500	820
270 + 500	840

Carriageway in accordance with local regulations

Columns in pit

Single Platform (EB)

usable platform width	B2	B3
230	255	250
240	265	260
250	275	270
260	285	280
270	295	290

Double Platform (DB)

usable platform width	B2	B3
460	490	480
470	500	490
480	510	500
490	520	510
500	530	520

Single and Double Platform (EB + DB) – Example

usable platform width	B2	B3
230 + 460	750	745
240 + 470	770	765
250 + 480	790	785
250 + 500	810	805
270 + 500	830	825

Carriageway in accordance with local regulations

Columns outside pit

Single Platform (EB)

usable platform width	B4	B5
230	250	240
240	260	250
250	270	260
260	280	270
270	290	280

Double Platform (DB)

usable platform width	B4	B5
460	490	480
470	500	490
480	510	500
490	520	510
500	530	520

Single and Double Platform (EB + DB) – Example

usable platform width	B4	B5
230 + 460	750	740
240 + 470	770	760
250 + 480	790	780
250 + 500	810	800
270 + 500	830	820

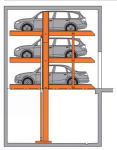
Carriageway in accordance with local regulations

For parking boxes on the edges and boxes with intermediate walls we recommend our maximum platform width of 270 cm for single platforms and 500 for double platforms. Problems may occur if smaller platform widths are used (depending on car type, access and individual driving behaviour and capability).

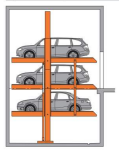
For larger limousines and SUV wider driveways are necessary (in particular on the boxes on the sides due to the missing manoeuvring radius).

Function

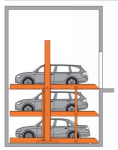
System lifted



System in middle position



System lowered



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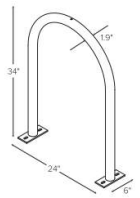
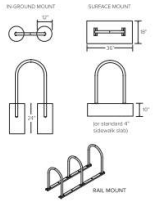
PROPOSED CLASS-II BICYCLE PARKING

DERO | Hoop Rack — Submittal Sheet





CAPACITY 2 Bikes

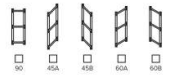
MATERIALS 1.5" schedule 40 pipe (1.9" OD)

FINISHES

- ☐ **Galvanized** An after fabrication hot dipped galvanized finish is our standard option.
- ☑ **Powder Coat** Our powder coat finish assures a high level of adhesion and durability by following these steps: 1. Sandblast 2. Epoxy primer electrostatically applied 3. Final thick TGIC polyester powder coat
- ☐ **Stainless** Stainless Steel: 304 grade stainless steel material finished in either a high polished shine or a satin finish.

MOUNT OPTIONS

- ☑ **Surface** Foot Mount has two 2.5" x 6" x .25" feet with two anchors per foot. Specify foot mount for this option. Tamper-resistant fasteners available upon request.
- ☐ **In-Ground** In-ground mount is embedded into concrete base. Specify in-ground mount for this option
- ☐ **Rail** Rail Mounted Downtown Racks are bolted to two parallel rails which can be left freestanding or anchored to the ground. Rails are heavy duty 3" x 1.4" x .376" thick galvanized mounting rails. Specify rail mount for this option.

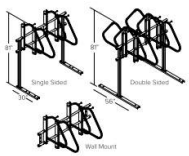


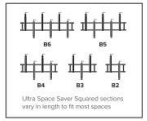
OPTIONAL LEAN BAR

- ☑ **Add Lean Bar**

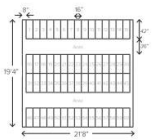
PROPOSED CLASS-I RESIDENTIAL BICYCLE PARKING

DERO | Ultra Space Saver Squared — Submittal Sheet





Ultra Space Saver Squared sections vary in length to fit most spaces



As a general guideline, the above space can fit approximately 60 bicycles.

The Ultra Space Saver Squared parks one bike every 16" with a typical bike extending out 42" from the wall.

CAPACITY Modular construction
1 bike per arm

MATERIALS
Hanger: 1" square tube with steel slider head with temporproof locking bolts.
Upright: 2" square tube.
Feet: AISI C3 x 41 galvanized steel channel.
Crossbeams: 2" sched. 40 galvanized pipe.

FINISHES

- ☑ **Black Powder Coat (Interior Use)** Our interior powder coat finish assures a high level of adhesion and durability for indoor use by following these steps: 1. Sandblast 2. Final thick TGIC polyester powder coat
- ☐ **Black Powder Coat (Exterior Use)** Additional Cost Our exterior powder coat finish assures a high level of adhesion and durability for outdoor or exposed air use by following these steps: 1. Sandblast 2. Epoxy primer electrostatically applied 3. Final thick TGIC polyester powder coat

MOUNT OPTIONS

- ☑ **Floor mount** Ultra Space Saver Squared have steel channel feet (30" for single sided and 56" for double sided units) which must be anchored to the floor.
- ☐ **Wall mount** A wall mounted unit which contains special brackets is also available for CMU or solid concrete walls. Cannot be used on sheetrock without additional support.

WHEEL STOPS

- ☑ **Include wheel stops**

Optional wheel stops are available for an additional cost

workbench
189 WALNUT AVENUE
SANTA CRUZ, CA 95060
WORKBENCHBUILT.COM
P: 831.227.2217

Exhibit D

3500 PAUL SWEET ROAD

3500 PAUL SWEET ROAD
SANTA CRUZ, CA 95065

LICENSED ARCHITECT JAY — NOT FOR CONSTRUCTION — CALIFORNIA

NOT FOR CONSTRUCTION

ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
0	DRG SUBMITTAL	01.20.24
1	SB330	03.19.24
2	SB330 - 6 STORY	04.18.24
3	PLANNING SUBMITTAL	06.06.24
4	PLANNING SUBMITTAL	09.16.24
6	PLANNING REVISION	03.04.25

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	OH
Checked by	EB
Scale	NTS

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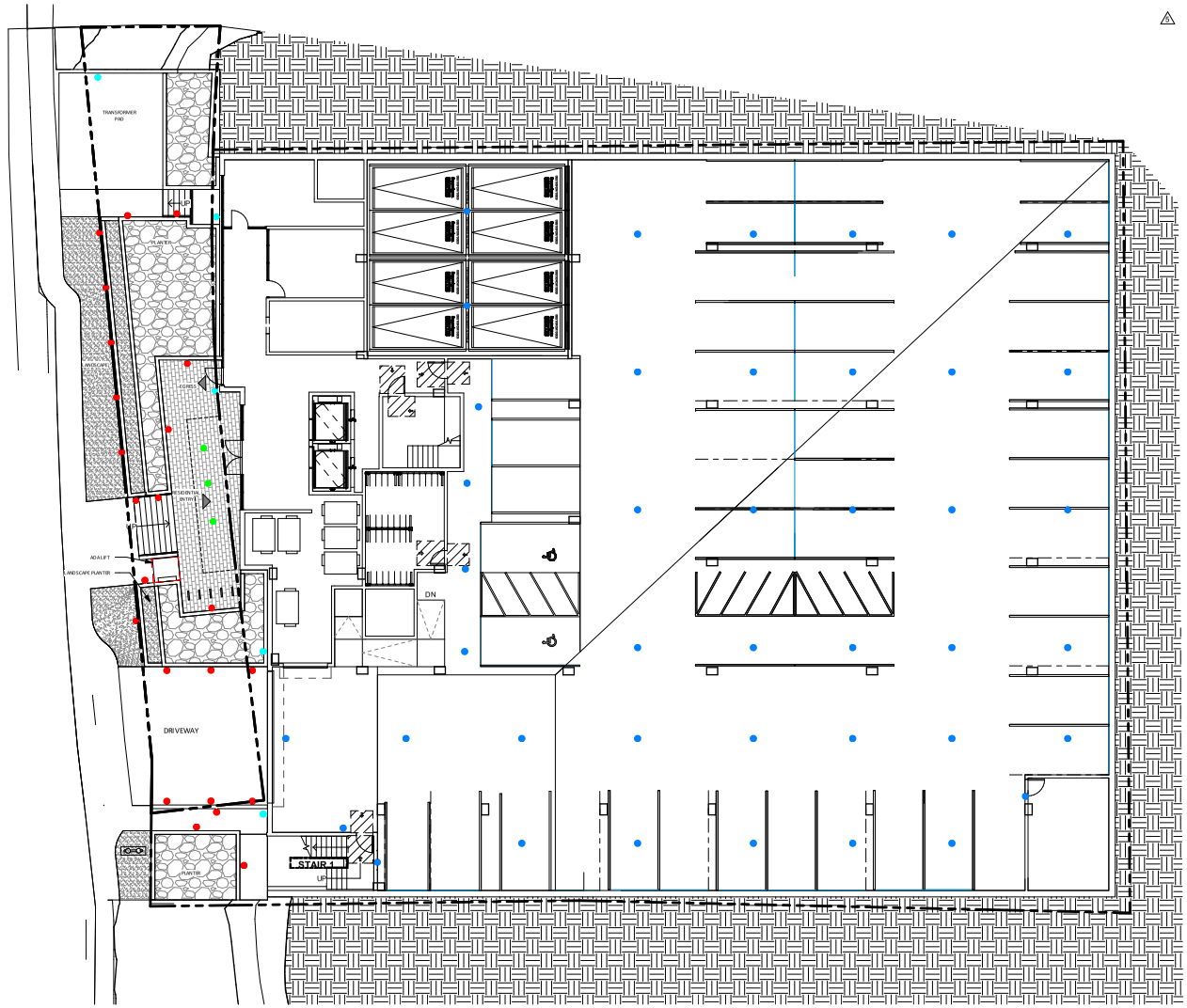
BICYCLE PARKING INFO

AP9.02



1 LEVEL 1 - LIGHTING - PLANNING
1" = 10'-0"

LIGHTING PLAN NOTES

1. SEE G SHEETS FOR GENERAL NOTES AND PROJECT INFORMATION.
2. LIGHTING SHOWN IS ONLY AT EXTERIOR LOCATIONS OR WITHIN MAIN GARAGE AREA AND IS ONLY SCHEMATIC.
3. SEE PLANS FOR ROOM NAMES.
4. SEE SURVEY FOR PROPOSED PARCEL DIMENSIONS.
5. SEE LANDSCAPE AND CIVIL DRAWINGS FOR ELEVATIONS, MATERIALS, DETAILS, DIMENSIONS AND PLANTING AREAS AT SIDEWALKS.
6. SEE LIGHTING FIXTURE SCHEDULE FOR PRELIMINARY PROPOSED LIGHT FIXTURE STYLES AND FINISHES, FINAL SELECTIONS TO BE PROVIDED IN THE BUILDING PERMIT STAGE.
7. FINAL LIGHTING PLAN WILL BE COORDINATED WITH SITE PHOTOMETRIC STUDIES PROVIDED BY A LIGHTING / ELECTRICAL ENGINEER.
8. LIGHTING PLANS AND PHOTOMETRIC ARE CONCEPTUAL ONLY. FINAL LIGHTING PLANS AND PHOTOMETRICS WILL BE SUBMITTED FOR BUILDING DEPARTMENT PLAN CHECK AND BUILDING PERMIT

DRAFT LIGHTING FIXTURE SCHEDULE

F1
WALL MOUNTED DOWN LIGHT
B.O.D.: HINKLEY LED HORIZONTAL STEP LIGHT
FINISH : DARK BRONZE

F2
ENTRANCE LIGHTING: LINEAR DOWNLIGHT
B.O.D.: ALCON WET LOCATION RECESSED LINEAR LED LIGHT
FINISH : WHITE

F3
ENTRANCE LIGHTING: WALL SCONCE
B.O.D.: WAC LIGHTING WET LOCATION TUBE ARCHITECTURAL LED WALL SCONCE
FINISH : DARK BRONZE
RATING: DARK SKY APPROVED

F4
GARAGE LIGHTING: SURFACE AND LED WALL SCONCE
B.O.D.: COOPER LIGHTING SOLUTIONS TOP TIER LED FIXTURE
FINISH : GREY

TRUE NORTH
PROJECT NORTH

workbench

189 WALNUT AVENUE
SANTA CRUZ, CA 95060
WORKBENCHBUILT.COM
P: 831.227.2217

Exhibit D

3500 PAUL SWEET ROAD

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SANTA CRUZ, CA 95065

LICENSED ARCHITECT JAY BRAUN STATE OF CALIFORNIA
NOT FOR CONSTRUCTION

NOT FOR CONSTRUCTION

ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
0	DRG SUBMITTAL	01.20.24
1	SB330	03.19.24
2	SB330 - 6 STORY	04.18.24
3	PLANNING SUBMITTAL	06.06.24
4	PLANNING SUBMITTAL	09.16.24
5	RESPONSE TO PLANNING COMMENTS	01.30.25

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	LB
Checked by	EB
Scale	As indicated

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EXTERIOR AND GARAGE LIGHTING PLAN

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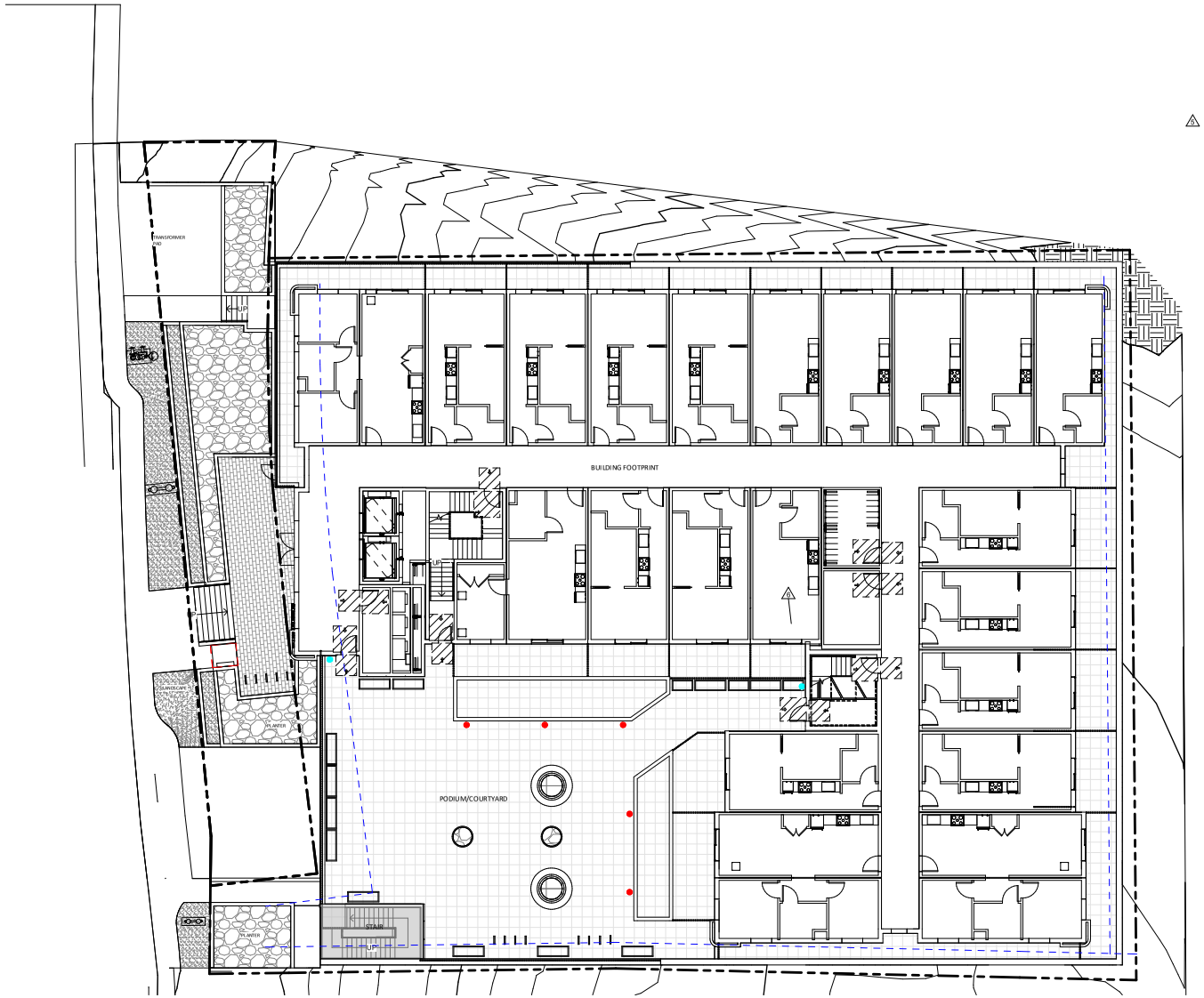

1 LEVEL 2 - EXTERIOR LIGHTING PLAN
1" = 10'-0"

TRUE NORTH

PROJECT NORTH

LIGHTING PLAN NOTES

1. SEE G SHEETS FOR GENERAL NOTES AND PROJECT INFORMATION.
2. LIGHTING SHOWN IS ONLY AT EXTERIOR LOCATIONS OR WITHIN MAIN GARAGE AREA AND IS ONLY SCHEMATIC.
3. SEE PLANS FOR ROOM NAMES.
4. SEE SURVEY FOR PROPOSED PARCEL DIMENSIONS.
5. SEE LANDSCAPE AND CIVIL DRAWINGS FOR ELEVATIONS, MATERIALS, DETAILS, DIMENSIONS AND PLANTING AREAS AT SIDEWALKS.
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DRAFT LIGHTING FIXTURE SCHEDULE

F1

WALL MOUNTED DOWN LIGHT
B.O.D.: HINKLEY LED HORIZONTAL STEP LIGHT
FINISH : DARK BRONZE

F2

ENTRANCE LIGHTING: LINEAR DOWNLIGHT
B.O.D.: ALCON WET LOCATION RECESSED LINEAR LED LIGHT
FINISH : WHITE

F3

ENTRANCE LIGHTING: WALL SCONCE
B.O.D.: WAC LIGHTING WET LOCATION TUBE ARCHITECTURAL LED WALL SCONCE
FINISH : DARK BRONZE
RATING: DARK SKY APPROVED

F4

GARAGE LIGHTING: SURFACE AND LED WALL SCONCE
B.O.D.: COOPER LIGHTING SOLUTIONS TOP TIER LED FIXTURE
FINISH : GREY

workbench
189 WALNUT AVENUE
SANTA CRUZ, CA 95060
WORKBENCHBUILT.COM
P: 831.227.2217

Exhibit D

3500 PAUL SWEET ROAD

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SANTA CRUZ, CA 95065

LICENSED ARCHITECT JAY BRADLEY CALIFORNIA
NOT FOR CONSTRUCTION

NOT FOR CONSTRUCTION

ISSUES/ REVISIONS

Issue	DESCRIPTION	DATE
0	DRG SUBMITTAL	01.20.24
1	SB330	03.19.24
2	SB330 - 6 STORY	04.18.24
3	PLANNING SUBMITTAL	06.06.24
4	PLANNING SUBMITTAL	09.16.24
5	RESPONSE TO PLANNING COMMENTS	01.30.25
6	PLANNING REVISION	03.04.25

APN	025-013-37
Project number	22140
Print Date	05.15.2025
Drawn by	LB
Checked by	EB
Scale	As indicated

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LEVEL 2 - EXTERIOR LIGHTING PLAN

AP9.06

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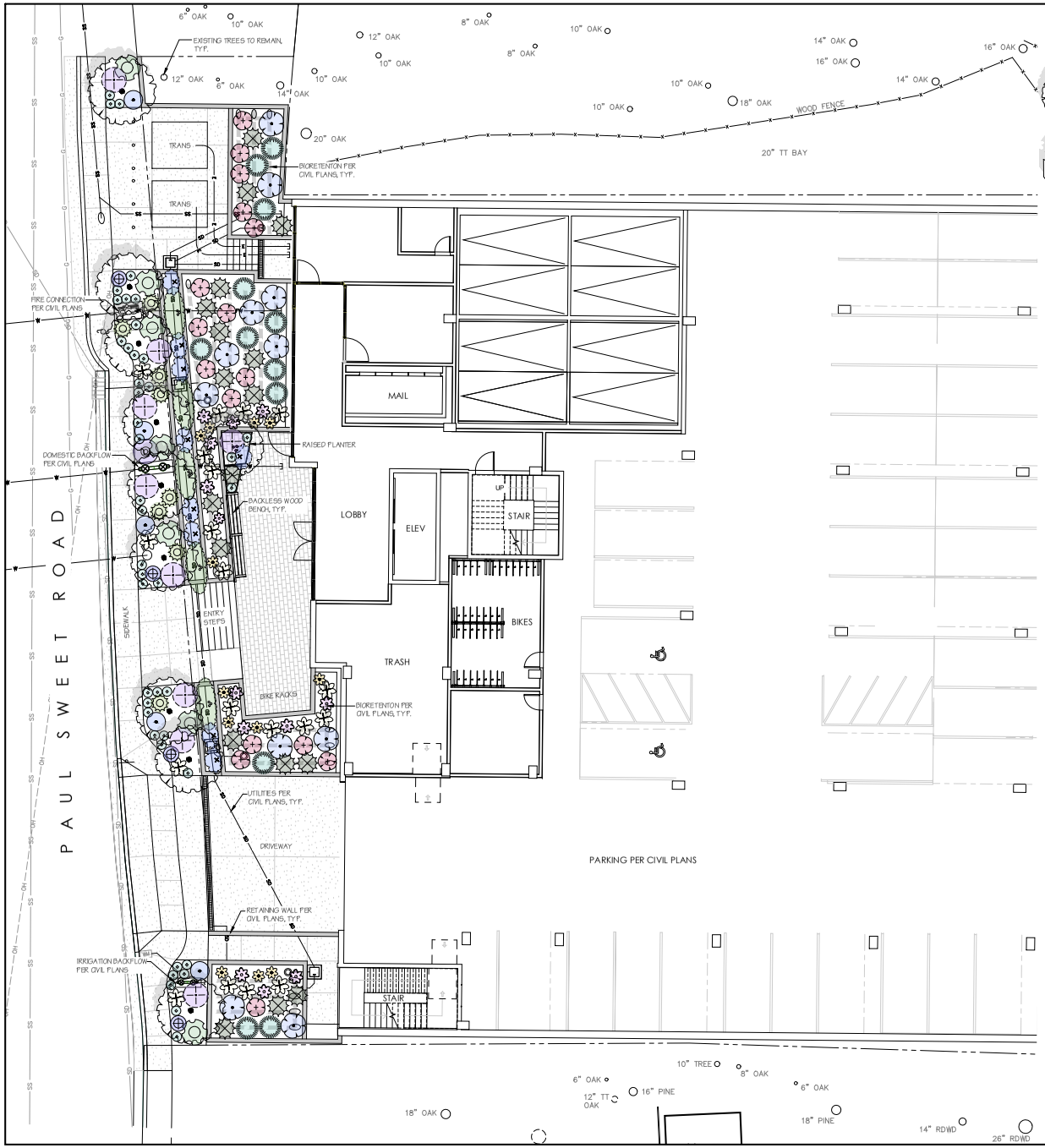


PLANT LEGEND

TREES	BOTANICAL NAME / COMMON NAME	SIZE	QTY	MATURE HT/WIDTH	WUCOLS
	LAGERSTROEMIA INDICA 'ZUNI' / PURPLE CRAPE MYRTLE (MULTI-TRUNK)	15 GAL	10	9' X 8'	M
	LAGERSTROEMIA INDICA X FAURIEI 'MUSKOGEE' / LAVENDER CRAPE MYRTLE (STANDARD TRUNK)	24"BX	9	18' X 15'	M
	OLEA EUROPAEA 'MONHER' / MAJESTIC BEAUTY FRUITLESS OLIVE	15 GAL	4	25' X 25'	L

SHRUBS AND PERENNIALS	BOTANICAL NAME / COMMON NAME	SIZE	QTY	MATURE HT/WIDTH	WUCOLS
	** ACHILLEA MILLEFOLIUM 'FIREFLY DIAMOND' / YARROW	1 GAL	19	2' X 3'	L
	** ACHILLEA MILLEFOLIUM 'PRETTY BELINDA' / YARROW	1 GAL	13	2' X 3'	L
	** ACHILLEA MILLEFOLIUM 'TERRA COTTA' / YARROW	1 GAL	12	2' X 4'	L
	AGAVE 'BLUE FLAME'	5 GAL	6	3' X 3'	L
	** ARCTOSTAPHYLOS 'SUNSET' / MANZANITA	5 GAL	7	3' X 5'	L
	** DUDLEYA BRITTONII	3 GAL	35	1' X 1'	L
	LAVANDULA X INTERMEDIA 'GROSSO' / FAT BUD LAVENDER	1 GAL	1	3' X 3'	L
	LAVANDULA X GINGINSII 'GOODWIN CREEK GRAY' / LAVENDER	1 GAL	9	3' X 3'	L
	LAVANDULA STOECHES 'DEDICATION' / SPANISH LAVENDER	1 GAL	10	2.5' X 2.5'	L
	SALVIA GUARANITICA 'BLACK & BLOOM' / SAGE	1 GAL	8	3.5' X 3'	L
	** SALVIA SPATHACEA / HUMMINGBIRD SAGE	1 GAL	16	2' X 3'	L
	** SALVIA ULGINOSA / BOG SAGE	1 GAL	11	4' X 4'	L
	** STACHYS BYZANTINA / LAMB'S EARS	1 GAL	82	1' X 1.5'	L

GRASSES	BOTANICAL NAME / COMMON NAME	SIZE	QTY	MATURE HT/WIDTH	WUCOLS
	CHONDROPETALUM TECTORUM / SMALL CAPE RUSH	1 GAL	18	3' X 3'	L
	LOMANDRA LONGIFOLIA 'BREEZE' / BREEZE DWARF MAT RUSH	1 GAL	29	2' X 3'	L
	** MUHLENBERGIA RIGENS / DEERGRASS	1 GAL	12	4' X 4'	L

TRAILING	BOTANICAL NAME / COMMON NAME	SIZE	QTY	MATURE HT/WIDTH	WUCOLS
	** MYOPORUM PARVIFOLIUM 'PUTAH CREEK' / WHITE CREEPING MYOPORUM	1 GAL	5	0.5' X 8'	L
	ROSMARINUS OFFICINALIS 'HUNTINGTON CARPET' / ROSEMARY	1 GAL	37	1.5' X 4'	L
	** SALVIA 'DARA'S CHOICE' / DARA'S CHOICE SAGE	1 GAL	16	1.5' X 6'	L

** = CALIFORNIA NATIVE PLANT

WUCOLS WATER USE CLASSIFICATION

H - HIGH WATER USE
M - MODERATE WATER USE
L - LOW WATER USE
VL - VERY LOW WATER USE

* NOTE: MATURE PLANT SIZES DO NOT ACCOUNT FOR SMALLER GROWTH HABIT WHEN GROWN IN CONTAINERS

PLANTING NOTES

1. TOTAL LANDSCAPE AREA TO BE 2,190 SF
2. SOIL AT GROUND LEVEL TO BE TESTED BY ACCREDITED SOIL TESTING LABORATORY. CONTRACTOR SHALL THOROUGHLY INCORPORATE SOIL ADDITIVES AND FERTILIZERS IN ALL PLANTING AREAS AT RATES AND DEPTHS RECOMMENDED BY SOILS LAB. SOIL ADDITIVES SHALL BE THOROUGHLY MIXED INTO EXISTING SOILS IN PLANTING PITS ONLY. ALL SOIL SHALL BE CLEAR OF DEBRIS AND CONSTRUCTION SPOILS. SOIL SHALL BE TILLED TO A DEPTH OF 6" AND AMENDED WITH 6 CY OF ORGANIC MATERIAL PER 1,000 SF TO PROMOTE INFILTRATION AND WATER RETENTION.
3. ALL PLANT MATERIAL IN FLOW-THRU PLANTERS AREA PER CENTRAL CALIFORNIA COAST, TECHNICAL ASSISTANCE MEMO (TAM) LID PLANT GUIDANCE FOR BIORETENTION. SOIL MIXTURE PER CIVIL PLANS. MULCH LAYER TO BE 1-2" THICK COMPOST MULCH THAT WILL NOT FLOAT.
4. ALL PLANTING AREAS (EXCEPT FLOW-THRU PLANTERS) ON SITE TO RECEIVE A 3" THICK LAYER OF 1/4" CRUSHED DECOMPOSED GOLD GRANITE AS MULCH.
5. ALL PLANTERS TO BE FILLED WITH CLEAN TOPSOIL.
6. THE INSTALLED LANDSCAPE SHALL BE MAINTAINED FREE OF INVASIVE PLANTS.

PRELIMINARY IRRIGATION NOTES

1. FULL IRRIGATION PLAN AND PRODUCT LIST WILL BE PROVIDED UPON BUILDING SUBMITTAL.
2. THE INTENT OF THE IRRIGATION SYSTEM IS TO PROVIDE THE MINIMUM AMOUNT OF WATER REQUIRED TO SUSTAIN GOOD PLANT HEALTH.
3. ALL NEW PLANT MATERIAL IN GROUND AND RAISED PLANTERS TO RECEIVE DRIP (POINT-SOURCE) EMITTERS EQUAL TO: HUNTER HE-B SINGLE OUTLET WITH SCREEN.
4. DRIP VALVES SHOULD BE EQUAL TO HUNTER ICZ-101 - BELOW GRADE IN VALVE BOXES
5. NO POTABLE WATER SHALL BE APPLIED DURING AND WITHIN 48 HOURS FOLLOWING MEASURABLE RAINFALL
6. IRRIGATION SYSTEM SHALL BE INSPECTED REGULARLY FOR LEAKS, MISALIGNED HEADS AND BAD VALVES, BROKEN EQUIPMENT SHALL BE REPAIRED PROMPTLY WITH IDENTICAL OR EQUIVALENT EQUIPMENT, AND WATERING SCHEDULES SHALL BE ADJUSTED TO REFLECT VARIATIONS IN WATER NEED BASED ON SEASON OR PLANT MATURITY.
7. LOCATE EQUIPMENT IN NEAREST ADJACENT PLANTERS AS FEASIBLE AND INDICATE EXACT LOCATION ON RECORD DRAWINGS.

mbLA
megan bishop
LANDSCAPE ARCHITECTURE
po box 328 aptos, ca 95001
(831) 818-9227
www.mb-landarch.com

LICENSED LANDSCAPE ARCHITECT
MEGAN BLENCOWE BISHOP
No. 5706
Exp. 4/11/26
STATE OF CALIFORNIA

THIS SHEET TO BE PRINTED AT 24" X 36"

Exhibit D

96

PAUL SWEET ROAD 6 STORY

3500 PAUL SWEET RD.
SANTA CRUZ, CA
APN#025-013-37

NORTH

SCALE: 1/8" = 1'-0"

PLAN REVISIONS

1	3/4/2025	RESPONSE TO PLAN CHECK

DATE = 6/7/2024
JOB = 2406

SHEET TITLE

LANDSCAPE PLAN LEVEL 1

SHEET NUMBER

L1.1

PLANT LEGEND

TREES	BOTANICAL NAME / COMMON NAME	SIZE	QTY	MATURE HT/WIDTH	WUCOLS
	LAGERSTROEMIA INDICA 'ZUNI' / PURPLE CRAPE MYRTLE (MULTI-TRUNK)	15 GAL	10	9' X 8'	M
	LAGERSTROEMIA INDICA X FAURIEI 'MUSKOGEE' / LAVENDER CRAPE MYRTLE (STANDARD TRUNK)	24" BX	9	18' X 15'	M
	OLEA EUROPAEA 'MONHER' / MAJESTIC BEAUTY FRUITLESS OLIVE	15 GAL	4	25' X 25'	L

SHRUBS AND PERENNIALS	BOTANICAL NAME / COMMON NAME	SIZE	QTY	MATURE HT/WIDTH	WUCOLS
	**ACHILLEA MILLEFOLIUM 'FIREFLY DIAMOND' / YARROW	1 GAL	19	2' X 3'	L
	**ACHILLEA MILLEFOLIUM 'PRETTY BELINDA' / YARROW	1 GAL	13	2' X 3'	L
	**ACHILLEA MILLEFOLIUM 'TERRA COTTA' / YARROW	1 GAL	12	2' X 4'	L
	AGAVE 'BLUE FLAME'	5 GAL	6	3' X 3'	L
	**ARCTOSTAPHYLOS 'SUNSET' / MANZANITA	5 GAL	7	3' X 5'	L
	**DUDLEYA BRITTONII	3 GAL	395	1' X 1'	L
	LAVANDULA X INTERMEDIA 'GROSSO' / FAT BUD LAVENDER	1 GAL	1	3' X 3'	L
	LAVANDULA X GINGINSII 'GOODWIN CREEK GRAY' / LAVENDER	1 GAL	9	3' X 3'	L
	LAVANDULA STOECHES 'DEDICATION' / SPANISH LAVENDER	1 GAL	10	2.5' X 2.5'	L
	SALVIA GUARANITICA 'BLACK & BLOOM' / SAGE	1 GAL	8	3.5' X 3'	L
	**SALVIA SPATHACEA / HUMMINGBIRD SAGE	1 GAL	16	2' X 3'	L
	**SALVIA ULIGINOSA / BOG SAGE	1 GAL	11	4' X 4'	L
	**STACHYS BYZANTINA / LAMB'S EARS	1 GAL	82	1' X 1.5'	L

GRASSES	BOTANICAL NAME / COMMON NAME	SIZE	QTY	MATURE HT/WIDTH	WUCOLS
	CHONDROPETALUM TECTORUM / SMALL CAPE RUSH	1 GAL	18	3' X 3'	L
	LOMANDRA LONGIFOLIA 'BREEZE' / BREEZE DWARF MAT RUSH	1 GAL	29	2' X 3'	L
	**MUHLENBERGIA RIGENS / DEERGRASS	1 GAL	12	4' X 4'	L

TRAILING	BOTANICAL NAME / COMMON NAME	SIZE	QTY	MATURE HT/WIDTH	WUCOLS
	**MYOPORUM PARVIFOLIUM 'PUTAH CREEK' / WHITE CREEPING MYOPORUM	1 GAL	5	0.5' X 8'	L
	ROSMARINUS OFFICINALIS 'HUNTINGTON CARPET' / ROSEMARY	1 GAL	37	1.5' X 4'	L
	**SALVIA 'DARA'S CHOICE' / DARA'S CHOICE SAGE	1 GAL	16	1.5' X 6'	L

** = CALIFORNIA NATIVE PLANT

WUCOLS WATER USE CLASSIFICATION

H - HIGH WATER USE
M - MODERATE WATER USE
L - LOW WATER USE
VL - VERY LOW WATER USE

* NOTE: MATURE PLANT SIZES DO NOT ACCOUNT FOR SMALLER GROWTH HABIT WHEN GROWN IN CONTAINERS

PLANTING NOTES

1. TOTAL LANDSCAPE AREA TO BE 2,190 SF
2. SOIL AT GROUND LEVEL TO BE TESTED BY ACCREDITED SOIL TESTING LABORATORY. CONTRACTOR SHALL THOROUGHLY INCORPORATE SOIL ADDITIVES AND FERTILIZERS IN ALL PLANTING AREAS AT RATES AND DEPTHS RECOMMENDED BY SOILS LAB. SOIL ADDITIVES SHALL BE THOROUGHLY MIXED INTO EXISTING SOILS IN PLANTING PITS ONLY. ALL SOIL SHALL BE CLEAR OF DEBRIS AND CONSTRUCTION SPOILS. SOIL SHALL BE TILLED TO A DEPTH OF 6" AND AMENDED WITH 6 CY OF ORGANIC MATERIAL PER 1,000 SF TO PROMOTE INFILTRATION AND WATER RETENTION
3. ALL PLANT MATERIAL IN FLOW-THRU PLANTERS AREA PER CENTRAL CALIFORNIA COAST_TECHNICAL ASSISTANCE MEMO (TAM) LID PLANT GUIDANCE FOR BIORETENTION SOIL MIXTURE PER CIVIL PLANS. MULCH LAYER TO BE 1-2" THICK COMPOST MULCH THAT WILL NOT FLOAT.
4. ALL PLANTING AREAS (EXCEPT FLOW-THRU PLANTERS) ON SITE TO RECEIVE A 3" THICK LAYER OF 1/4" CRUSHED DECOMPOSED GOLD GRANITE AS MULCH
5. ALL PLANTERS TO BE FILLED WITH CLEAN TOPSOIL.
6. THE INSTALLED LANDSCAPE SHALL BE MAINTAINED FREE OF INVASIVE PLANTS.

PRELIMINARY IRRIGATION NOTES

1. FULL IRRIGATION PLAN AND PRODUCT LIST WILL BE PROVIDED UPON BUILDING SUBMITTAL.
2. THE INTENT OF THE IRRIGATION SYSTEM IS TO PROVIDE THE MINIMUM AMOUNT OF WATER REQUIRED TO SUSTAIN GOOD PLANT HEALTH.
3. ALL NEW PLANT MATERIAL IN GROUND AND RAISED PLANTERS TO RECEIVE DRIP (POINT-SOURCE) EMITTERS EQUAL TO: HUNTER HE-B SINGLE OUTLET WITH SCREEN.
4. DRIP VALVES SHOULD BE EQUAL TO HUNTER ICZ-101 - BELOW GRADE IN VALVE BOXES
5. NO POTABLE WATER SHALL BE APPLIED DURING AND WITHIN 48 HOURS FOLLOWING MEASURABLE RAINFALL
6. IRRIGATION SYSTEM SHALL BE INSPECTED REGULARLY FOR LEAKS, MISALIGNED HEADS AND BAD VALVES, BROKEN EQUIPMENT SHALL BE REPAIRED PROMPTLY WITH IDENTICAL OR EQUIVALENT EQUIPMENT, AND WATERING SCHEDULES SHALL BE ADJUSTED TO REFLECT VARIATIONS IN WATER NEED BASED ON SEASON OR PLANT MATURITY.
7. LOCATE EQUIPMENT IN NEAREST ADJACENT PLANTERS AS FEASIBLE AND INDICATE EXACT LOCATION ON RECORD DRAWINGS.

mbLA
megan bishop
LANDSCAPE ARCHITECTURE
po box 328 aptos, ca 95001
(831) 818-9227
www.mb-landarch.com

LICENSED LANDSCAPE ARCHITECT
MEGAN BLENCOWE BISHOP
NO. 5706
Exp. 4/11/26
STATE OF CALIFORNIA

THIS SHEET TO BE PRINTED AT 24" X 36"

Exhibit D

67

PAUL SWEET ROAD 6 STORY

3500 PAUL SWEET RD.
SANTA CRUZ, CA
APN#025-013-37

NORTH

0 4 8 14

SCALE: 1/8" = 1'-0"

PLAN REVISIONS

1	3/4/2025	RESPONSE TO PLAN CHECK

DATE • 6/7/2024

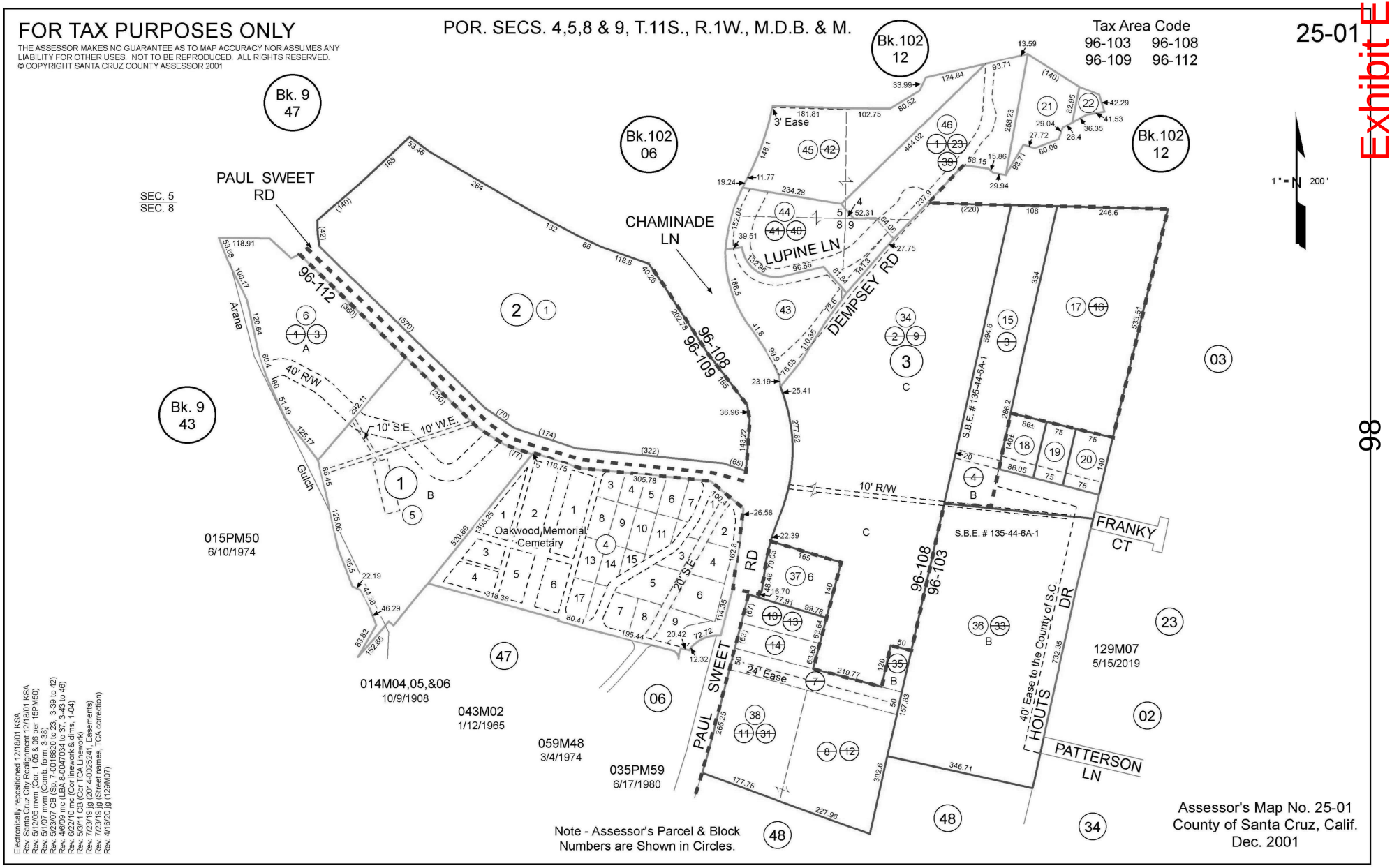
JOB • 2406

SHEET TITLE

LANDSCAPE PLAN LEVEL 2

SHEET NUMBER

L1.2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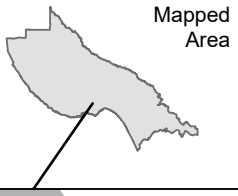
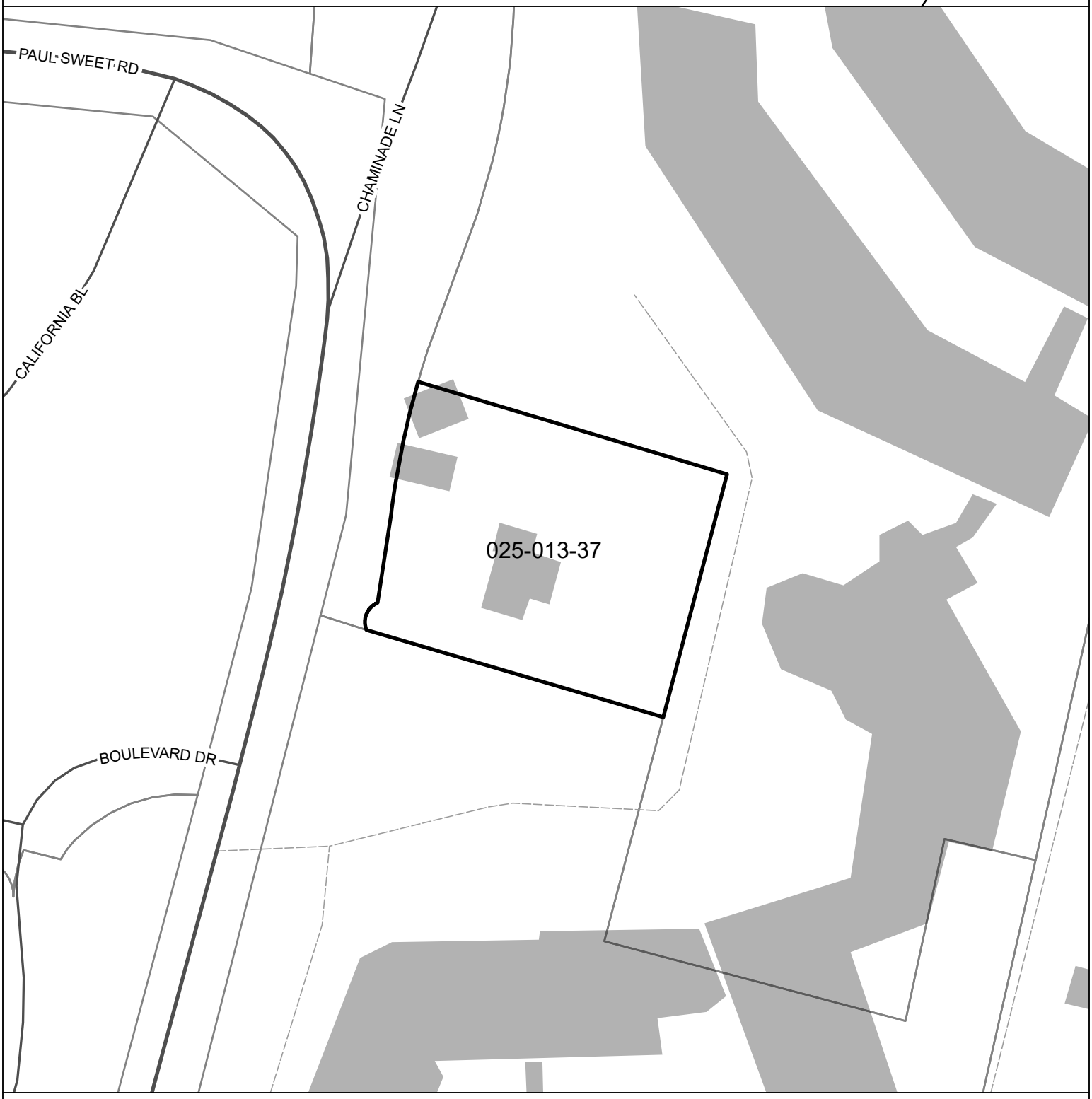
POR. SECS. 4,5,8 & 9, T.11S., R.1W., M.D.B. & M.
Tax Area Code
96-103 96-108
96-109 96-112
25-01
Exhibit E
98
Bk. 9 47
Bk.102 12
Bk.102 06
Bk. 9 43
SEC. 5
SEC. 8
PAUL SWEET RD
CHAMINADE LN
LUPINE LN
DEMPSEY RD
96-112
96-108
96-109
96-103
Arana Gulch
40' R/W
10' S.E.
10' W.E.
10' R/W
20' S.E.
24' Ease
3' Ease
40' Ease to the County of S.C.
Oakwood Memorial Cemetary
S.B.E. # 135-44-6A-1
FRANKY CT
HOUTS DR
PATTERSON LN
015PM50
6/10/1974
014M04,05,&06
10/9/1908
043M02
1/12/1965
059M48
3/4/1974
035PM59
6/17/1980
129M07
5/15/2019
Note - Assessor's Parcel & Block Numbers are Shown in Circles.
Assessor's Map No. 25-01
County of Santa Cruz, Calif.
Dec. 2001
1 " = 200 '
Electronically repositioned 12/18/01 KSA.
Rev: Santa Cruz City Realignment 12/18/01 KSA
Rev. 5/12/05 mvm (Cor. 1-05 & 06 per 15PM50)
Rev. 5/1/07 mvm (Comb. form, 3-38)
Rev. 5/23/07 CB (Sb. 7-00168820 to 23, 3-39 to 42)
Rev. 4/6/09 mc (LBA 8-00471034 to 37, 3-43 to 46)
Rev. 6/22/10 mc (Cor linework & dims. 1-04)
Rev. 5/3/11 CB (Cor TCA Linework)
Rev. 7/23/19 jg (2014-0025241, Easements)
Rev. 7/23/19 jg (Street names. TCA correction)
Rev. 4/16/20 jg (129M07)

Santa Cruz County Planning Department

Parcel Location Map





Parcel: 02501337

Subject Parcel

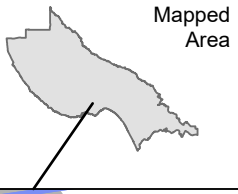
0 40 80
Feet

Map printed: 30 Dec. 2025

Exhibit E

Santa Cruz County Planning Department

Parcel General Plan Map



PAUL SWEET RD

CHAMINADE LN

CALIFORNIA BL

BOULEVARD DR

O-R

P

C-O

025-013-37

R-UH

Subject Parcel

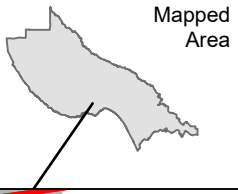
0 40 80

Feet

Exhibit E

Santa Cruz County Planning Department

Parcel Zoning Map



PAUL SWEET RD

CHAMINADE LN

CALIFORNIA BL

BOULEVARD DR

PR

PA

PF

PA-Min

025-013-37

RM-2.5

Subject Parcel

0 40 80

Feet

Exhibit E

Parcel Information

Services Information

Urban/Rural Services Line:	_X_ Inside __ Outside
Water Supply:	City of Santa Cruz Water District
Sewage Disposal:	Santa Cruz County Sanitation District
Fire District:	Central Fire District
Drainage District:	Zone 5

Parcel Information

Parcel Size:	25,471 square feet / 0.585-acre
Existing Land Use - Parcel:	Residential
Existing Land Use - Surrounding:	Residential, Assisted Living Facility, Public Facilities, Medical Facilities
Project Access:	Paul Sweet Road
Planning Area:	Live Oak
Land Use Designation:	C-O (Professional Office), R-UH (Urban High Density Residential)
Zone District:	PA-Min (Professional Administrative Office - Ministerial Combining District), RM-2.5 (Multifamily Residential - 2,500 square feet per unit)
Coastal Zone:	__ Inside _X_ Outside
Appealable to Calif. Coastal Comm.	__ Yes _X_ No

Technical Reviews: Soils Report Review, Biotic Report Review

Environmental Information

Geologic Hazards:	Not mapped/no physical evidence on site
Fire Hazard:	Not a mapped constraint
Slopes:	About 20% at front of site, about 7% main (central and rear) area of site
Env. Sen. Habitat:	Potential sensitive habitat
Grading:	Approximate cut and fill volumes of 10,745 cubic yards and 1 cubic yards respectively proposed
Tree Removal:	39 trees proposed to be removed
Scenic:	Not a mapped resource
Archeology:	Not mapped/no physical evidence on site

COUNTY OF SANTA CRUZ - DESIGN GUIDELINES PROJECT CHECKLIST

Reference document

3rd Submittal NO CHANGE FROM 2nd Subl

ZONING DISTRICT	RF (Builder's Remedy)
NUMBER OF UNITS (EXCL. ADUs)	105
VARIATIONS REQUESTED	

PROJECT: **3500 Paul Sweet Apl#241360**

Fronting Streets	Typology
Paul Sweet Road	Active Connector

Find Typology on County GIS under Layer List > General Plan > Gen'l Plan Street Typologies.
Refer to Chapter 3 of the Santa Cruz County General Plan for more info on street typologies.
See Appendix A of the Design Guidelines for Street Zone Standards.

Exhibit G

Provision	Description	Subjective or Objective?	Complies with Standard?	Requests Waiver	Requests Concession	Plan Sheet Number	Zoning Code Section	Comments
OVERARCHING DESIGN GUIDELINES (CH. 2)								
1 Establish site planning and building orientation patterns that create active street edges	Design guidelines for the Pleasure Point Commercial Corridor are provided as Appendix B to these design guidelines. Design guidelines for other specific geographic areas are provided in village, town, and community plans under separate cover, such as the Aptos Village Plan. To determine whether any specific geographic area design guidelines apply to a given parcel, consult Chapter 2 of the General Plan, as well as the County's online mapping application (https://gis.santacruzcounty.us/gisweb/).	*If a standard clearly does not apply to the Project, select "N/A," otherwise select "Subjective" or "Objective."* *If a standard is Subjective, select "See comments" for Complies with Standard, and select "No" for Requests Waiver and Requests Concession.* *If a standard is Objective, select "Yes," "No," or "N/A" as appropriate for Complies with Standard.* *Physical objective standards should select "Yes" for Requests Waiver. Discuss concessions with Clay.*						
2 Create open spaces that support on-site uses and create a network of interconnected activesafe and attractive public and private open spaces.								
3 Encourage new structures that have compatible mass and scale, architectural style and materials that respect and contribute to the neighborhood context.								
4 Install landscaping and design utilities and trash enclosures to increase the quality of frontages, enhance open spaces, provide screening and contribute to the overall aesthetic of the site.								
5 Integrate sustainable and pedestrian-oriented design across all development types.								
A Site Planning								
A1 Building Placement	Place new structures at or near public right-of-way edge of Main Street and Active Connector street types to activate the pedestrian realm. Where needed, building placement along Multimodal Corridors may allow landscaped buffers. Building placement along Local Residential Streets should follow the pattern of existing neighborhood context. Place buildings to preserve existing natural systems such as creeks.	Subjective	Yes	No	No	L1.1		lanscape strip provoded between sidewalk and building
A2 Corners	Locate new development to activate important street corners	Subjective	See comments	No	No	AP1.01		Podium takes up entire site
A3 Building Orientation	Maximize the length of street-facing frontage of new structures along public streets to encourage street definition and activation.	Subjective	See comments	No	No	AP1.01		Lobby and residentail amenities on ground level are designed to be street facing
A4 On-Site Parking	Provide on-site parking behind buildings rather than between buildings and street frontages, especially along Main Streets, Multimodal Corridors and Active Connectors.	Objective	No	Yes	No	AP0.51		Parking is under the building in the podium. SDBL Waiver
A5 Setbacks	Provide street-facing setbacks to ensure space for the pedestrian amenity zone, pedestrian sidewalk zone, and activity zone.	Objective	No	Yes	No	AP0.51		SDBL Waiver
A6 Useable Open Spaces within Street-Facing Setbacks	Design wider setbacks as active, usable open spaces such as pocket plazas and other programmable areas, especially for projects fronting Active Connectors and Main Streets.	Subjective	See comments	No	No	AP1.01- AP1.03		Levels 2-6 are set back to create a 2nd level terrace facing the street
A7 Interior Side and Rear Setbacks	Buffer new development from less intense neighboring land uses with increased side and rear setbacks.	Subjective	See comments	No	No	AP0.51		Podium takes up entire site.
B Building Design								
B1a Upper Floor Stepbacks	Visually break up building mass through the use of upper floor wall **stepbacks**. This is especially important for buildings that are three or more stories when sited near lower-scaled structures on adjoining properties.	Subjective	See comments	No	No	AP1.01- AP1.03		Levels 2-6 are setback from level one podium.
B1b	Stepback - setback of an upper fl oor of a building from a lower floor.	Objective	No	Yes	No	AP0.01- AP0.03		SDBL Waiver
B1c	*See SCCC 13.10.323 for residential third story setback requirements ...*	Objective	No	Yes	No	AP0.01- AP0.03	Table 13.10.323-2 Minimum of 50% of exterior walls of the third story set back at least 10 feet from **property** setback lines	SDBL Waiver
B1d	*... and SCCC 13.10.333 for commercial third story setback requirements.*	N/A						
B2 Wall Plane Variation	To add visual interest, consider creating setback offests of at least one (1) foot in depth every 25 to 50 feet of wall plane along street-fronting walls.	Subjective	See comments	No	No	AP3.02		Offsets occure roughly every 30' for streetfacing facades

B3	Roofline Variation	Consider using a variety of roof designs and dormers to create variation in building height and further enhance visual interest. Pitched roofs with dormers can be used to reduce the appearance of upper-floor building mass.	Subjective	See comments	No	No	Ap3.01-AP3.02		Parapets have varying heights to create some articulation
B4	Building Modulation	Provide vertical and horizontal modulations with elements such as facade extrusions and recesses, alternating materials and roof forms, to provide more interest and depth to the building facade. Modulations - building facades differentiated by depth, direction, or material.	Subjective	See comments	No	No	Ap3.01-AP3.02		Façade is designed to have extrusions at corners and parapet levels and variation in material and scale.
B5	Façade Articulation	Provide an array of treatments such as trim, **awnings**, windows, balconies, and other architectural elements to create variation along the building facade. **Awnings** - fabric projections that provide weather protection, identity, or decoration	Subjective	See comments	No	No	Ap3.01-AP3.02		Façade is designed to provide balconies, windows, and alternating materials around windows for funtcional and visual intrest
B6	Design Consistency	Select compatible and highquality building materials that harmonize with the overall project design, landscaping, and neighboring structures.	Subjective	See comments	No	No	Ap3.01-AP3.02		Compatable materials were selected. See material palleton elevations
B7	Balconies, Patios and Decks	Design decks, patios, and upper floor balconies along high-visibility corridors and frontages to create an "eyes on the street" effect and foster a more inviting and comfortable street environment.	Subjective	See comments	No	No	Ap3.01-AP3.02		Balconies are positioned to overlook open spaces and streetfrontages
B8	Windows	Place ground floor and upper floor windows and openings along all exposed edges of the building face with particular attention to public streets.	Subjective	See comments	No	No	Ap3.01-AP3.02		Windows are along all facades
B9a	Ground Floor Activity Area	Create an attractive and open ground floor design along building frontages for all development types in order to help activate the streetscape. Locate public and publicly oriented uses on the ground floor of buildings to encourage pedestrian activity.	Subjective	See comments	No	No	AP1.01		Podium takes up entire site, landscaping is provided as a buffer between building and the street
B9b		*See SCCC 13.10.335(C) for ground floor commercial use requirements.*	Subjective	See comments	No	No		13.10.335 Public facilities requirements for commercial districts. (A) All regulations of the local fire department or County Fire Marshal shall be met to ensure adequate road access and water availability for fire protection. (B) All requirements of the local sanitation district and water district shall be met, or requirements for on-site sanitation and water systems if applicable to the site location. (C) All improvement requirements and impact fees for community facilities shall be met where required by district or ordinance regulations (SCCC Title 15). (D) The recommendations of the Santa Cruz Metropolitan Transit District should be met to ensure the provision of adequate transit facilities. For industrial projects of 6,000 square feet or larger, a letter indicating the Transit District's recommendation shall be submitted with the project applications. [Ord. 5423 § 12, 2022; Ord. 4346 § 18, 1994; Ord. 4263 § 2, 1993. Formerly 13.10.334].	SCCC 13.10.335(C) does NOT have to do with ground floor commercial use requirements. Possible error in the design standards?

C Open Space

C1	Frontage Open Space	Consider allocating activity zones along Main Street and Active Connector street frontages as open spaces for public use. These spaces can be designed as plazas, forecourts or paseos, programmed uses such as	Subjective	See comments	No	No	AP1.01		Podium takes up entire site with entrance patio facing the street
C2	Internal Open Space	Design internal open spaces tailored to on-site building users including common open spaces for building residents, and outdoor seating, plazas, forecourts and paseos to support businesses	Subjective	See comments	No	No	AP1.02, L1.3		2nd level terrace programed for residential amenities
C3	Parklets	When possible, repurpose public right-of-way and parking spaces into passive common public space to serve as seating and outdoor retail for clientele and the general public. Such installations are well-suited for Main	Subjective	See comments	No	No	AP1.01		No commercial or retail space is proposed
C4	Amenities	Design open spaces with chairs, tables, trash receptacles, lighting, shade features, and landscaping to create outdoor social areas, especially along commercial frontages and on residential properties.	Subjective	See comments	No	No	AP1.01, AP1.02, L1.1 L1.2		Open spaces are programed for residentail amenities including seating. BBQ, and landscaping
C5	Shading	Incorporate shade elements in open spaces through elements such as canopies, awnings, trellises, umbrellas, or other similar features. Adequate tree cover may fulfill this purpose as well.	Subjective	See comments	No	No	AP1.01, AP1.02, L1.1 L1.2		Shade trees are provided along street and second level terrace

D Access, Circulation and Parking

Exhibit G

D1	Primary Pedestrian Access	Locate primary ground floor pedestrian building entrances for access from the public sidewalk, especially on Multimodal Corridors, Active Connectors and Main Streets. If a building faces more than one of these street types, determine primary street frontage by the following priority: (1) Main Street, (2) Active Connector and (3) Multimodal Corridor.	Subjective	See comments	No	No	AP1.01		Building access provided from public sidewalk along Paul Sweet Rd.
D2	Residential Unit Pedestrian Access	Orient residential buildings so that the majority of ground floor units have individual entries from public streets. This encourages a safe and activated streetscape.	Objective	Yes	No	No	AP1.01		Podium building. No ground-floor units.
D3a	Parking and Access	Locate parking areas toward rear of the site or otherwise obstruct from off-site views, while maintaining appropriate access for people with disabilities. On Main Streets, discourage parking lots between street frontages and buildings. On Multimodal Corridors, surface parking lots should occupy less than 50% of any single street frontage.	Objective	Yes	No	No	AP1.01		Parking areas are "otherwise obstruct[ed] from off-site views. All parking is in the podium.
D3b		*See County Design Criteria and SCCC 13.16 for parking design requirements.*	Objective	No	Yes	No	AP1.01	Entire chapter SCCC 13.16	Parking lot does not comply with all objective standards of SCCC 13.16 SDBL Waiver
D4a	Curb Cuts	Limit curb cuts for vehicle entrances and exits to maximize pedestrian character and safety. Curb cuts should not exceed the minimum width required.	Subjective	See comments	No	No	C1.0		Single curb cut leading into parking garage.
D4b		*See County Design Criteria for curb cut requirements.*							
D5	Landscape Buffers	Parking lots located along street frontages should include landscaped buffers to screen and soften the appearance of parking lots. See Section G: Landscaping for more guidance on parking lot landscaping.	Subjective	See comments	No	No	AP1.01		Parking is provided inside garage and setback from street.
D6	Surface Parking Coverage	Consider limiting the total automobile area (parking, driveways, travel lanes, etc.) to less than half of the total site area, inclusive of surface parking lots and new streets. Underground or structured parking is encouraged as an alternative to surface parking lots where feasible and appropriate.	Subjective	See comments	No	No	AP1.01, AP3.01-AP3.02		Parking garage is mostly below grade and setback from street.
D7	Parking Podiums	For buildings with integrated parking garages, maximum height of a parking podium visible from a street should be one story from finished grade. **Parking podiums** should only be open-sided on the back or when facing alleys. Integrate shallow commercial spaces at ground level to activate the streetscape. **Parking podium** - Above-ground parking structure enclosed by walls and supporting residential or commercial space overhead.	Objective	Yes	No	No	AP3.01-AP4.02		Parking podium is one story, partially subterranean, visible from street one story. Not open-sided. Not providing commercial, as it is not required by the RF zone.
D8a	Bike Parking	Install shared long and short term bike parking outside buildings along Multimodal Corridors, Active Connectors and Main Streets, and in interior building locations for on-site residents and workers, if applicable. Provide covered bike parking whenever possible.	Objective						
D8b		*See SCCC 13.16.040 for bike parking requirements.*	Objective	No	Yes	No	AP1.01		Class 2 bike parking spaced 2' apart SDBL Waiver
D9	Paving Materials	Create more comfortable pedestrian environments through the use of high-quality paving materials for on-site, at-grade surfaces used by both vehicles and pedestrians on private property. Consider pavers, colored concrete, and stamped or scored concrete.	Subjective	See comments			c1.0, L1.1		A variety of surface materials are being proposed for the project.
D10	ADA Compliance	Ensure minimum four-foot wide wheelchair-accessible pedestrian pathways, including where sidewalks cross driveway ramps.	Objective	Yes	No	No	C1.0		This is a federal and state law. The project will comply.
D11	Pedestrian Crossings	Create enhanced internal pedestrian crossings delineated with materials or colors to prioritize pedestrians within developments. Mid-block pedestrian crosswalks should be provided on blocks longer than 500 feet.	Subjective	See comments	No	No	Ap3.01-AP3.02		A variety of surface materials are being proposed for the project.
D12	Access to Amenities and Networks	Connect building and site design to transit stops and pedestrian/ bike networks. Provide controlled pedestrian access to creeks and other open space amenities where appropriate. Consider public access easements through large parcel developments.	Subjective	See comments	No	No	C1.0		The project maintains and enhances connections from public frontange along paul sweet rd.

E Community Character

E1	Sense of Place	Encourage traditional and contemporary styles that respond to the character and climate of the local community, while reinforcing a sense of place through adaptation of local architectural influences.	Subjective	See comments	No	No	Ap3.01-AP3.02		The project represents a contemporary approach to building materials and massing while also pursuing a high amount of articulatiuon and relief acheivable within the constraints of modular construction.
E2	Consistent Theme	Ensure visual interest and continuity with the streetscape and adjacent neighborhoods through massing, architectural styles, materials, colors, and other treatments that respect local scale and character. Use design elements such as materials, colors, textures, and roofl ines to articulate the design theme.	Subjective	See comments	No	No	Ap3.01-AP3.02		The project represents a contemporary approach to building materials and massing while also pursuing a high amount of articulatiuon and relief acheivable within the constraints of modular construction.
E3	Identity	Where possible, incorporate art and sustainable elements to celebrate local stories and community values.	Subjective	See comments	No	No			This is something that will be considered as the project evolves beyond the planning and entitlements stage.
E4	Frontages	Provide staggered block frontages and pedestrian areas within setbacks to reflect massing that is consistent with adjacent structures.	Subjective	See comments	No	No			Adjacent structures do not have a consistent frontage along any pedestrian areas.

Exhibit G

E5	Complementary Style	Use complementary textures, colors, and materials to ensure that new buildings seamlessly blend into existing residential neighborhoods and mixed-use and commercial corridors. Rehabilitate existing buildings by retaining the architectural style of original buildings while adding new elements that improve functionality such as skylights that maximize natural light.	Subjective	See comments	No	No			Adjacent existing buildings in the neighborhood do not have a consistent set of textures, colors or materials. The project proposes a materials palette that is complementary to traditional building materials that can be found across Santa Cruz county.

F Neighborhood Transitions

F1a	Stepped Massing	Encourage building massing to be **stepped down** or provide greater setbacks when adjacent to property designated for low-density residential development in order to create visual interest and reduce the perception of bulk and height. **Stepped-down massing** - shorter building height near the edges of a new development where the new development borders existing shorter buildings.	Subjective	See comments	No	No	AP1.01- AP1.03		The massing has been setback from the podium below and along paul sweet rd.
F1b		*See SCCC 13.10.323 for residenital third-story setbacks and SCCC 13.10.333 for setback requirements for commercial buildings adjacent to residential or agricultural developments.*	Objective	No	Yes	No	AP1.01- AP3.02	Table 13.10.323-2 Minimum of 50% of exterior walls of the third story set back at least 10 feet from **property** setback lines	SDBL Waiver
F2a	Scale Contrasts	Reduce the bulk and scale of multi-unit and mixeduse buildings by including upperlevel dormers, angled roofs and other similar architectural elements. Use a variety of colors and materials to de-emphasize the bulkiness and height of upper building levels.	Subjective	See comments	No	No	Ap3.01- AP3.02		The massing has been setback from the podium below and along paul sweet rd. Articulation in building materials is proposed to help break up the visual mass of large facades
F2b		*See SCCC 13.11.070(B)(3) for infill development design strategies.*	Subjective	See comments	No	No		13.11.070(B)(3) Infill Development. Infill development within the County's urban services line is encouraged according to the County General Plan. Considerations for neighborhood context and reducing impacts on existing adjacent development shall be accomplished by providing adequate transitions in building massing and rooflines, setbacks, and landscape buffering at property lines shared with lower density development or between commercial/industrial/public facility development and residential properties.	Lower level parking garage has been designed to be primarily underground and upper levels stepped back from property line to reduce mass of the building. No balconies are proposed along adjacent residential property
F3	Finer Scale	Encourage larger buildings to be broken up into smaller, distinct individual forms reflective of the scale and character of adjacent structures and the local neighborhood.	Subjective	See comments	No	No			The massing of the proposed building is articulated and proposes material changes to break up the overall mass.
F4	Horizontal Elements	Use horizontal linear elements such as porches, balconies, **clerestory windows**, **cornices** or **plinths** to counteract the vertical mass of taller buildings and complement the character of surrounding neighborhoods. **Clerestory Windows** - windows above eye level designed to let in light **Cornice** - molding along the ledge of a building **Plinth** - base or platform that supports a structure	Subjective	See comments	No	No			Balconies and cornices are used along with material changes to create visual intrest
F5a	Transitional Landscaping	Use trees and landscaping to soften scale differences, particularly in areas where trees and vegetation are unifying aspects of community character. Landscaping should also be used to provide privacy screening when a commercial project adjoins existing residential or lower-scale commercial development.	Subjective	See comments	No	No			Lanscaping provided along Paul Sweet rd to buffer the building and step up from the street. Landscaping planters and trees are also proposed along the second level terrace to stoften and provide shade for the open space
F5b		*See SCCC 13.11.070(D) for landscaping design requirements.*	Objective				L1.1, L1.2	Lengthy section SCCC 13.11.070(D)	See landscape plans, and please advise any items we will need to waive.

G Landscaping

G1	Corridor Landscaping	Along commercial corridors, use landscape treatments to define outdoor spaces, screen unsightly features, buffer pedestrians from high-traffic areas, and create a shaded, inviting pedestrian experience while maintaining public safety.	Subjective	See comments	No	No			Landscaping buffer is proposed between sidewalk and building to provide shade and visual buffer, enhancing the pedestrian experience
G2	Plant Palette	Utilize locally appropriate plant species to improve quality of life, reduce heat island impacts and create the conditions for thriving wildlife habitats and ecological systems. Encourage plant species that provide habitat or food sources for butterflies, birds, honey bees and other pollinators.	Subjective	See comments	No	No			See Lanscape plans for proposed planting
G3	Green Landscapes	Consider green roofs, green walls and edible landscapes. Edible plants may be segregated into particular landscaped areas such as community gardens or integrated with the larger landscape.	Subjective	See comments	No	No			See Lanscape plans for proposed planting

Exhibit G

G4a	Tree Placement	Locate trees to increase shade and provide buffers for parking areas, buildings, and the public realm. For security purposes, openings should be incorporated into the landscape design to provide clear views into sites.	Subjective	See comments	No	No			See Lanscape plans for proposed tree locations
G4b		**California Building Code 5.106.12.1 Surface parking areas.** For non-residential and mixed-use projects, shade tree plantings, minimum #10 container size or equal, shall be installed to provide shade over 50% of the parking area within 15 years.	Objective	Yes	No	No			State law. Project will comply.
G4c		**California Building Code 5.106.12.2 Landscape areas.** For non-residential and mixed-use projects, shade tree plantings, minimum #10 container size or equal, shall be installed to provide shade over 20% of the landscape area within 15 years. Exception: Playfi elds for organized sport activity are not included in the landscape area calculation.	Objective	Yes	No	No	L1.1, L1.2		State law. Project will comply.
G4d		*See SCCC 13.11.070(D), ...*	Objective				L1.1, L1.2	Lengthy section SCCC 13.11.070(D)	See landscape plans, and please advise any items we will need to waive.
G4e		*... SCCC 13.16.060(D) ...*	Objective	Yes	No	No		Lengthy section SCCC 13.16.060(D)	N/A PARKING IS WITHING GARAGE AND MOSTLY UNDERGROUND
G4f		*... and County Design Criteria for landscape design requirements for sites, streets and parking areas.*							

H Sustainability

H1	Energy Conservation	Reduce energy usage and carbon footprint using energy efficiency and energy generation technologies in the building and open space design in support of Santa Cruz County's Climate Action Plan goals.	Subjective	See comments	No	No			The project team will seek to pursue any feasible sustainaility and energy conservation measures, at a minimum meeting building energy code requirements.
H2	On-Site Energy Production	Encourage the installation, maintenance and use of solar and wind power generation systems on new or remodeled commercial buildings. Explore structures and mechanisms that can serve a dual purpose as public art features either through their design, movement or lighting.	Subjective	See comments	No	No			The project will comply with required building and energy codes.
H3	Passive Solar Design	Consider passive heating and cooling techniques during building design. Integrate these elements to articulate building facades. **Passive Solar heating and cooling** - The use of the sun's energy directly for heating and cooling. Walls and floors are stone, concrete, or other materials that collect, store and distribute solar heat. Windows and shades are designed to let in light and heat in the winter but not in the summer, based on the angle of the sun in the sky	Subjective	See comments	No	No			The project uses deep facade articulation and balconies to provide shading to south facing windows/glazing.
H4	Shading	Control solar heat gain and glare using external shading devices.	Subjective	See comments	No	No			The project uses deep facade articulation and balconies to provide shading to south facing windows/glazing.
H5	Operable Windows	Incorporate operable windows or ventilated double facades to allow natural ventilation and reduce energy consumption.	Subjective	See comments	No	No			The project proposes operable windows for passive ventilation in each residential unit.
H6	Natural Lighting	Maximize exposure to daylight with glass, skylights, atriums, and **light reflector**s. Design windows on northern facades and shading on southern facades to reduce reliance on artificial lighting. **Light reflectors** - trim around light fixture to maximize light transmittal from the fixture or from a window and direct light to other areas	Subjective	See comments	No	No			The project maximizes exposure to daylight within the constraints of modular constuction. The project utilizes a deep facade and balconies to provide shading on the souther facade.
H7	Stormwater Management	Create an integrated system of **pervious** and **impervious** systems that function together to capture, transport, filter/prefilter and treat stormwater on site in order to reduce off-site flows, replenish groundwater and provide water for landscape irrigation. Incorporate **swales** and **rain gardens** into the design of pedestrian amenity zones. **Pervious** - Allowing water to pass through. Examples of pervious site materials include landscaping, gravel, brick or stone pavers without grout, and pervious asphalt and concrete. **Impervious** - Not allowing water to pass through. Examples include roofing, asphalt, concrete, and grouted brick or stone pavers. Runoff from impervious surfaces causes erosion and flooding. **Swale**- Landscaped linear ditch that collects, filters, and slows the flow of stormwater. **Rain Garden** - Garden bed planted with deeprooted species that collects and absorbs on-site stormwater into the soil. *See County Design Criteria for stormwater management design requirements*	Subjective	See comments	No	No			See civil plans for the stormwater strategy that uses a variety of pervious and impervious systems, etc.

Exhibit G

H8	Building Stormwater Runoff	Encourage drainage systems that divert stormwater runoff from building rooftops, parking areas, and hardscapes (sidewalks, pathways, plazas) into **cisterns** or stormwater systems integrated into on-site open space designs or public art features. **Cistern** - A tank for storing water, located above or below ground.	Subjective	See comments	No	No			See civil plans for the drainage system strategy.
H9a	Preserve Existing Natural Systems	Situate buildings to preserve existing natural systems and mitigate negative environmental impacts.	Subjective	See comments	No	No			
H9b		*See SCCC 13.11.070(B) for environmental consideration requirements in site design.*						Lengthy section SCCC 13.11.070(B)	

I Trash Enclosures and Utilities

I1	Trash Location	Ensure trash enclosures are located away from public view and pedestrian path of travel on Main Streets, Active Connectors and adjacent parcels in order to minimize noise and odor impacts typically associated with garbage collection and storage.	Objective	Yes	No	No	AP1.01		Trash room located in podium.
I2	Trash Size	Ensure enclosures are of sufficient size to house the number and size of bins and containers needed to accommodate the waste generated by building users, including trash, cardboard, cans and bottles, food waste, green waste, and other recyclables.	Objective	Yes	No	No	AP1.01		Trash room designed for expected waste requirements, per American Trash Management (consultant to project)
I2	Trash Size	*See SCCC 13.11.070(C)(2) for recycling and waste storage design requirements.*	Objective	Yes	No	No	AP1.01	Lengthy section SCCC 13.11.070(C)(2)	Trash room designed and coordinated for pick up requirements with waste management company
I3	Trash Screening	Screen trash enclosures to reduce their visual impact on the overall site and building design. Screening should be constructed of durable materials. Structural screening such as fences should be supplemented with landscaping.	Objective	Yes	No	No	AP1.01		Trash room located in podium.
I4a	Utility Screening	Either contain (within a building) or fully screen all utility cabinets, meters, and backflow prevention devices on Active Connectors and Main Streets to reduce visual impacts. Screening mechanisms can include landscaping, fencing, low walls, or other techniques.	Objective	No	Yes	No	AP0.51		Utilities are placed per project requirements. Rooftop mechanical shall be screened. Pad mounted transformers are placed per PG&E requirements. SDBL Waiver
I4b		*See SCCC 13.11.070(C)(1) for utility equipment design requirements.*						Lengthy section SCCC 13.11.070(C)(2)	
I5	Outdoor Storage and Delivery Screening	Screen outdoor storage and delivery areas containing materials, supplies, utilities or equipment from public view along Multimodal Corridors, Active Connectors, Main Streets, and Local Residential Streets. Consider using landscaping and art elements to screen larger areas.	Objective	Yes	No	No	AP0.51		No outdoor storage areas or delivery areas.

MULTI FAMILY RESIDENTIAL (CH. 3)

1	Provide livable and functional multifamily housing that is affordable to residents of a variety of income levels.		Subjective	See comments	No	No			The project proposes a range of unit sizes and affordability in line with the state and county requirements
2	Cultivate inviting frontage conditions and activate the streetscape and provide natural surveillance ("eyes on the street") while also serving ground floor residential units.		Subjective	See comments	No	No			The project proposes windows, balconies and terrace spaces facing the public street.
3	Allow creativity and flexibility in architectural form and design that accommodates highdensity housing while respecting the scale, style and character of the local context.		Subjective	See comments	No	No			L shaped building steps the upper units back from the street and adjacent property lines. The project proposes a materials palette that is complementary to traditional building materials that can be found across Santa Cruz county.
4	Provide well-designed open space and other housing amenities that meet the needs of a diverse mix of residents.		Subjective	See comments	No	No			See proposed terrace amenites on landscape plans
5	Provide sensitive transitions between residential and commercial properties.		Subjective	See comments	No	No			There are no adjacent commercial property, this provision does not apply
6	Plan and design efficient pedestrian and vehicular access layouts that prioritize direct pedestrian connections to the street and encourage residents to walk, bike, and take transit.		Subjective	See comments	No	No			Pendestrian access has been extended along the length of the property with direct connection to the lobby. The project proposes more than the minimum required bike parking to help incourage residents to bike.

A SITE PLANNING

A1	Building Placement - Neighborhoods	Within residential neighborhoods, locate multifamily buildings in the center front of the site, especially if other buildings in the neighborhood follow this pattern. Locate front yards along public streets to assist in cultivating a sense of community and neighborhood feel.	Objective	No	Yes	No	AP0.51		Podium building takes up entire site. SDBL Waiver

Exhibit G

A2	Building Placement - Corridors	Along Multimodal and Active Corridors, place buildings along the edge of frontages with adequate space to accommodate a front yard area between the building face and the edge of the fronting streetscape.	Subjective	See comments	No	No			Podium building takes up entire site. Building was set back from the street frontage as much as possible to provdide landscape.
A3	Building Orientation	Orient buildings towards public streets with the primary entrance to housing units on the ground fl oor directly accessible from an adjacent sidewalk. Internally-facing buildings with primary entrances oriented toward a common space should prioritize the pedestrian experience. Primary building facades and entrances should not face parking areas when the option to face the street is available.	Objective	No	Yes	No	AP1.01- AP1.03		No ground floor living units. No ability to comply for a podium project. SDBL Waiver
A4	Parking Location	When feasible, locate parking at the center or rear of the site, improving street frontages and minimizing views of parking areas from public streets. For sites adjoining other residential properties, locate access driveways at the side of the site where feasible to act as a buffer.	Subjective	See comments	No	No			Parking garage is mostly belowgrade and setback from street
A5	Front Yard Setbacks	Along streets where walking and streetscape activity is encouraged, site multifamily buildings close to the street to connect the development with the streetscape. A greater setback distance may be appropriate to create a common open space or enhanced front yards to enrich the streetscape. Along Multimodal Corridors, multifamily buildings may be placed further back from the street to buffer living areas from noise, privacy and emissions impacts.	Subjective	See comments	No	No			Podium takes up entire site, building frontage is set back from street and provides a landscape buffer
A6	Open Space	Locate common open space areas in front and side yard areas when possible. On larger sites with multiple structures or along Multimodal Corridors, explore centrally-located common open spaces.	Subjective	See comments	No	No			Common open space faces paul sweet road.

B BUILDING DESIGN

B1a	Building Mass	Encourage highest building height and mass to be located near the center of the site and building footprint. Building mass should taper from the center of the site toward the property lines to emulate the scale and style of single-family residential development and allow for solar access to open spaces, especially within neighborhoods. Design upper floor mass to complement neighborhood scale by incorporating design elements such as upper floor stepbacks and gable and hip roof forms.	Subjective	See comments	No	No			Building mass steps back with slope of site with tallest portion of the building facing the street and shorter sides facing the neighboring properties.
B1b		*See SCCC 13.10.323(C) for third floor stepback requirements.*	Objective	No	Yes	No	AP0.01- AP0.03	Table 13.10.323-2 Minimum of 50% of exterior walls of the third story set back at least 10 feet from property setback lines	SDBL Waiver
B2	Wall Plane Variation	To add visual interest, consider offsets of at least one (1) foot in depth to differentiate building units and emulate surrounding development patterns.	Subjective	See comments	No	No			The project proposes a wide variety of plane changes across the massing to differentiate the different building units, see the project renderings.
B3	Setback Variation	On larger projects, consider utilizing fl uctuating setbacks approximatley every 25 to 35 feet or the width of one housing unit to create a rhythm along the street edge.	Subjective	See comments	No	No			The project is articulated within the constraints of modular construction
B4	Roofline Variation	Consider utilizing changing roof heights, roof slope angles and dormers to create variation in the roofl ine and building height profi le and further enhance visual interest.	Subjective	See comments	No	No			Parapet height varies to help create visual interest
B5a	Building Step-Backs	Upper floor building mass should be stepped back along internal frontages to provide solar access to common open spaces, internal drives, and other on-site spaces.	Subjective	See comments	No	No			Building mass is stepped back from podium level to reduce mass and footprint. Creating access to common open spaces
B5b		Upper-floor stepbacks along frontages should be incorporated along Local Residential Streets.	Subjective	See comments	No	No			Upper residential levels are set back frop podium level
B5c		*See SCCC 13.10.323(C) for third floor stepback requirements.*	Objective	No	Yes	No	AP0.01- AP0.03	Table 13.10.323-2 Minimum of 50% of exterior walls of the third story set back at least 10 feet from property setback lines	SDBL Waiver
B6	Building Modulation	Create variation in building mass along building faces to diminish the sense of bulk, and provide more interest and depth to building form. Building modulation to balance bulk and mass is especially important within the Residential Flex (RF) zone district where buildings may take up a larger percentage of the lot area compared to other residential zone districts.	Subjective	See comments	No	No			The project is articulated within the constraints of modular construction
B7	Façade Articulation	Provide an array of facade treatments such as trim, awnings, bay windows, balconies, and other architectural elements to create variation along the building face.	Subjective	See comments	No	No			The project proposes balconies and cornices to create variation along the façade

Exhibit G

B8	Façade Design	Utilize a harmonious palette of materials and color to add visual interest.	Subjective	See comments	No	No			The project represents a contemporary approach to building materials and massing while also pursuing a high amount of articulatiuon and relief acheivable within the constraints of modular construction.
B9	Materials Modulation	Emphasize modulating and articulating building elements through material changes to create more visual interest.	Subjective	See comments	No	No			The project proposes a wide variety of articulation and material change across the massing within the constraints of modular construction, see the project renderings.
B10a	Design Consistency	Select compatible and high-quality building and landscape materials that harmonize with the overall project design, landscaping, and neighboring structures. On larger projects, ensure design continuity throughout the project through similar architectural styles, materials, colors, and other treatments.	Subjective	See comments	No	No			Adjacent existing buildings in the neighborhood do not have a consistent set of textures, colors or materials. The project proposes a materials palette that is complementary to traditional building materials that can be found across Santa Cruz county. See landscape drawings for proposed plantings
B10b		*See SCCC 13.11.070(D) for landscape design requirements, including requirements for front yards, plant species, tree planting and removal, site furniture and fixtures, and buffering and screening*	Objective				L1.1, L1.2	Lengthy section SCCC 13.11.070(D)	See landscape plans, and please advise any items we will need to waive.
B11	Frontage Design	Locate the front door to housing in a visible location from the adjacent streetscape. Entrances that front Multimodal Corridors should be designed to create distance and differentiation from the streetscape. This may be achieved through landscaping, wider front yards, fencing, and/or elevated stoops.	Subjective	See comments	No	No			Building entrance is proposed along Paul Sweet rd and buffered by landscape see site plan.
B12	Windows	Place ground floor and upper floor windows and openings along exposed edges of the building face with particular attention to buildings fronting public streets. Additionally, locate balconies, raised decks, patios and other outdoor private open space elements along highly visible frontages. This encourages doors and windows to open onto the public street and provides eyes on the street	Subjective	See comments	No	No			Upper level residentil windows are proposed on all facades, balconies placed along publicly facing façade and open spaces.

C OPEN SPACE

C1a	Private Open Space	On sites zoned Residential Multifamily (RM), provide 60 square feet of private open space for every unit.	N/A						RF zoning applies per builder's remedy.
C1b		Site buildings to accommodate stoops and porches along ground floor unit entrances, including internal-facing front yards.	Objective	No	Yes	No	GP0.04,GP0.05		No ground floor living units. No ability to comply for a podium project. SDBL Waiver
C1c		On sites zoned Residential Flex (RF), higher density development may not allow for private open space for every unit.	Objective	Yes	No	No	GP0.04,GP0.06		RF zoning applies per builder's remedy. Private open space not provided for every unit.
C1d		Wherever private open space is provided for multifamily projects, the minimum dimension should be six feet in order to ensure that the space is usable.	Objective	Yes	No	No	GP0.04,GP0.05		All dimensions of balconies and patios, where provided, are not a minimum of 6 ft.
C2a	Common Open Space	On sites zoned RM, provide 200 square feet of common open space per unit.	N/A						RF zoning applies per builder's remedy.
C2b	Common Open Space	On sites zoned RF, provide at least 15% of gross site area as private or common open space.	Objective				GP0.04,GP0.07		RF zoning applies per builder's remedy.
C2c	Common Open Space	Locate common open space areas in front and side yard areas when possible. On larger sites with multiple structures or along Multimodal Corridors, explore centrally-located common open spaces, such as plazas, that are interconnected with a network of pedestrian paths to individual private open spaces.	Subjective	See comments	No	No			Common open space on second level faces paul sweet rd
C2d	Common Open Space	Wherever common open space is provided, the minimum dimension should be 15-20 feet to ensure that the space is usable.	Objective	Yes	No	No	GP0.04,GP0.07		
C2e	Common Open Space	*See SCCC 13.10.323(D) for usable open space requirements.*	Objective	No	Yes	No	GP0.04,GP0.05	Lengthy section SCCC 13.10.323(D)	Common open space square footage requirements not met. See GP0.04-GP0.05 SDBL Waiver
C3	Private / Common Open Space Interface	Consider locating private open spaces for individual housing units next to common open spaces. Where possible, connect different open spaces with elements such as strolling paths to foster a sense of community	Subjective	See comments	No	No			Balconies face common open space.
C4	Amenities	Install chairs, tables, trellises and other shade features to create outdoor social areas in common spaces that serve as internal gathering spots.	Subjective	See comments	No	No			Common open space provides a variety of seating, planting and other ammenities, see landscape drawings
C5a	Front Yards	Design front yards and front setback areas to accommodate residential amenities, passive recreational activity, trees and landscaping.	Subjective	See comments	No	No			The building frontage along Paul Sweet Rd is buffered by landscape, see landsape drawings for proposed plantings and trees
C5b		Within front setback areas along Local Residential Streets and in residential neighborhoods, create a front yard environment that offers common open space for residents and complements the front yard use patterns in the neighborhood to help build community.	Subjective	See comments	No	No			2nd level terrace faces paul sweet rd. and provides common open space. The building frontage along Paul Sweet Rd is buffered by landscape, see landsape drawings for proposed plantings and trees
C5c		Along Multimodal Corridors and Active Connectors, use front yard areas to screen residential units, and consider locating common open space in interior areas such as courtyards to provide a more restful space for residents.	Subjective	See comments	No	No			3rd level terrace faces paul sweet rd. and provides common open space. The building frontage along Paul Sweet Rd is buffered by landscape, see landsape drawings for proposed plantings and trees

Exhibit G

C5d		*See SCCC 13.11.070(D) for front yard landscape design requirements.*	Objective				L1.1, L1.2	Lengthy section SCCC 13.11.070(D)	4th level terrace faces paul sweet rd. and provides common open space. The building frontage along Paul Sweet Rd is buffered by landscape, see landsape drawings for proposed plantings and trees
C6	Res Flex Sites	On sites zoned RF, front yard setbacks and open space areas may be smaller compared to other multifamily sites in order to accommodate larger buildings and more residential units. On these sites, include common open space areas whenever feasible, especially on sites with more than 10 units. Consider providing common open space as one large area to enhance usability and a sense of community, in a location that is visible and easily accessed by all units, and accessible to users of all ages and physical abilities.	Subjective	See comments	No	No			5th level terrace faces paul sweet rd. and provides common open space. The building frontage along Paul Sweet Rd is buffered by landscape, see landsape drawings for proposed plantings and trees
C7	Play Element Amenities	On large sites, consider installing onsite play features to support active and passive recreation needs for people of all ages and abilities and encourage a family-friendly community	Subjective	See comments	No	No			See landscape plan for proposed common open space ammenites.
C8	Gardens	Explore community gardens to serve the needs of the development and neighborhood residents.	Subjective	See comments	No	No			The project will consider this after the planning phase

D ACCESS, CIRCULATION, PARKING

D1	Curb Cuts	Limit curb cuts for vehicular access to a maximum of one per frontage and up to three for developments with more than two frontages. Curb cuts should not exceed the minimum width required. Driveways should be designed so that sidewalks remain ADA compliant as they cross driveways. *See County Design Criteria for curb cut requirements.*	Objective	Yes	No	No	C1.0		Project has a single vehicular access into a parking garage. ADA is a federal and state law and the project will comply.
D2	Resident Parking	Encourage garage parking as the preferred covered residential parking option. On larger projects, encourage podium parking if feasible.	Subjective	See comments	No	No			Podium parking is provided
D3	Guest Parking	Consolidate and locate surface parking for guests, if required, at several locations throughout the project site, to reduce the visual impact of large swaths of parking.	Subjective	See comments	No	No			No surface level parking is provided
D4	Efficient Parking	Encourage space efficient parking options such as shared driveways, tandem parking, stacked parking, valet parking and parking garages to maximize space for building and open spaces.	Subjective	See comments	No	No			Car puzzler is provided to maximize parking count
D5	Access Drives	Locate vehicular access driveways at the periphery of the site. Design drives to visually accommodate two-way vehicular circulation on large sites. Consider creating shared driveways between adjoining properties. *See SCCC 13.16 and County Design Criteria for access driveway, vehicular parking and pedestrian path design requirements.*	Subjective	See comments	No	No			Two-way vehicular access is provided at the garage entrance from Paul Sweet Rd.
D6	Pedestrian Paths	Construct distinguishable pedestrian paths for residents and guests. Pedestrian paths should utilize different materials, colors and textures from the vehicular driveway, and ideally should be separated from from the driveway. For large projects, design at least one mid-block pedestrian connection along each frontage with a clear and welldesigned pedestrian path.	Subjective	See comments	No	No			Pedestrian paths are provided along the frontage, see civi drawings
D7	Unit Access	When applicable, install high-quality exterior staircases accessing upper-floor units that match the aesthetics and materials of the building.	Subjective	See comments	No	No			Exterior stairs are proposed from the terrace to the ground level, see elevations
D8	Unit Entrances	For all street-facing ground floor residential units, consider providing a visible entrance that directly connects to the sidewalk to create a pleasant streetscape environment.	Subjective	See comments	No	No			Building lobby entrance is accessed along paul sweet rd directly connecting the pedestrian sidewalk to the building entrance

Exhibit G

CITY OF SANTA CRUZ
Water Department

WATER SERVICE INFORMATION FORM

Surf City Saves
Water For Our Future

June 24, 2025

Owner:	Sweet Developments Llc
Site Address:	3500 Paul Sweet Rd, Live Oak
Site APN:	025-013-37
Project Description:	6 Story -100% Residential - 105 Unit

Dear Workbench 1032189:

Your project is located within the City of Santa Cruz Water Service area.The subject parcel is currently a developed lot, with an existing water service, and is subject to the following conditions:

Exhibit H

1. Fire service as required by the Central Fire Protection District (CFPD). CFPD phone number: (831) 685-6698.

2. A new, 6" fire service is estimated to be installed with an approved, minimum size, 4" DCDA backflow device assembly as per SCWD Details 1, 9, 11, 12 & 19.

3. A new 6" "Steamer" fire hydrant is estimate to be installed. The location of the fire hydrant must be approved by the jurisdictional fire agency and the Water Department. Installation of hydrant per SCWD Details 1, 10, 11, 12 & 19.

4. A new 3" domestic water service with an approved, "no-lead" reduced pressure (RP) backflow device assembly, equivalently sized to the water meter, is estimated to be installed as per SCWD Details 1, 6, 11, 12 & 19.

5. The existing 3/4" service is estimated to be repurposed as irrigation service. The existing B9 meter box is required to be retrofitted with a new B16 Christy meter box/lid, and a property-side customer shutoff valve is required to be installed within the box as per SCWD Details 2 & 5 and an approved, "no-lead" reduced pressure (RP) backflow device assembly, equivalently sized to the water meter, is required to be installed on the domestic water service as per SCWD Detail 8.

6. The contractor shall confirm that the appropriate encroachment permit has been obtained prior to beginning work in non-City of Santa Cruz rights-of-way.

7. Revisions Required;

   - Sheet C2.0, Utility Plan: Revise Notes to reference SCWD Standard Details.

   - Sheet C2.0, Utility Plan: The incorrect note is called out for the 3" DOM Service.

   - Include all SCWD Standard Details (1, 2, 5, 6, 8, 9, 10, 11, 12, 14, 19) on their own sheet within the plan set.

   - Provide a demolition Plan sheet that calls out the source of construction site water.

   - Please provide the updated sheets detailing the plumbing fixture count, hydraulic calculations, & Landscape plan set. Once this is received, an official SCWD service sizing assessment will be conducted, and a updated SCWD Water Service Information (WSI) packet will be provided with any applicable plan review comments.

8. Please see the attached standard Details and list of certified water service installation contractors. All water permit fees are due prior to the issuance of the Water Service Installation Permit. All water service retrofit work must be completed for this project prior to signing off on the building permit final.

If you have any questions, please contact the Water Department Engineering Division at (831) 420-5210

Sincerely,

Dean Randazzo
City of Santa Cruz | Water Dept., Engineering
212 Locust Street, Suite C
Santa Cruz, CA 95060

Exhibit H

NEW WATER SERVICE- *Permit Fee Estimate*

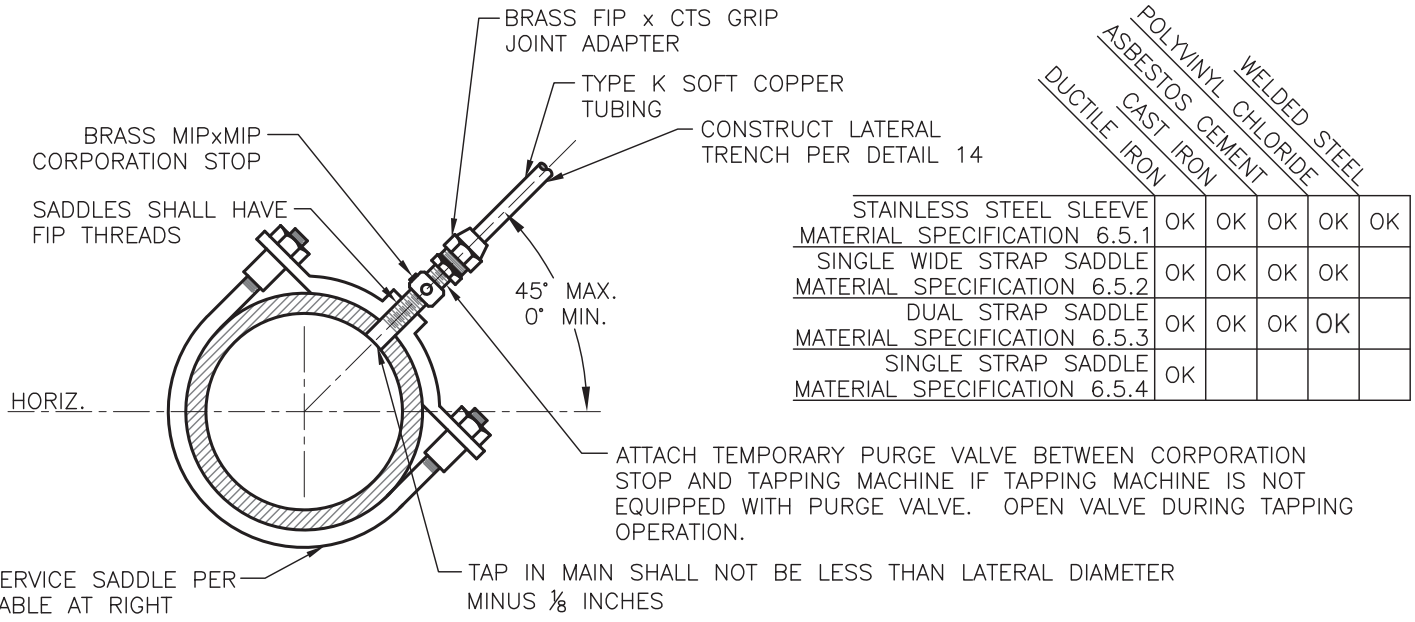
WTP24-0149

Mtr Config	Use Type	Type/Size	Fee Description	Num of Units	Unit Cost	Sub Total
	MASTER WATER PERMIT		WATER DEV FEE - 3 (2021)	1	195,271.00	$195,271.00
			WATER DEV FEE - 3/4 (2021)	1	$16,738.00	$16,738.00
			C/D PLAN REVIEW RESIDENTIAL PER UNIT	84	$118.00	$9,912.00
			MATERIAL FEE- 3 METER	1	$1,488.00	$1,488.00
			TAP INSPECTION FEE	3	$354.00	$1,062.00
			09-28-2024 TECHNOLOGY SURCHARGE - WATER			$796.32
			INSTALLATION FEE - 3 METER	1	$750.00	$750.00
			BACKFLOW DEVICE INSPECTION	3	$236.00	$708.00
			FIRE HYDRANT INSPECTION	1	$354.00	$354.00
			MATERIAL FEE- 3/4 METER	1	$213.00	$213.00
			MATERIAL FEE- 5/8 METER	1	$196.00	$196.00
			INSTALLATION FEE - 3/4 METER	1	$125.00	$125.00
			INSTALLATION FEE - 5/8 METER	1	$125.00	$125.00
			GENERAL INSPECTION FEE	1	$118.00	$118.00
			C/D PLAN REVIEW COMMERICAL FIRE SERVICE	1	$118.00	$118.00
			9/28/2024: WTR DEV 5/8"	1		-$11,159.00
					PERMIT FEE TOTALS:	**$216,815.32**

PERMIT FEE ESTIMATE**	**TOTAL FEE**
	$216,815.32

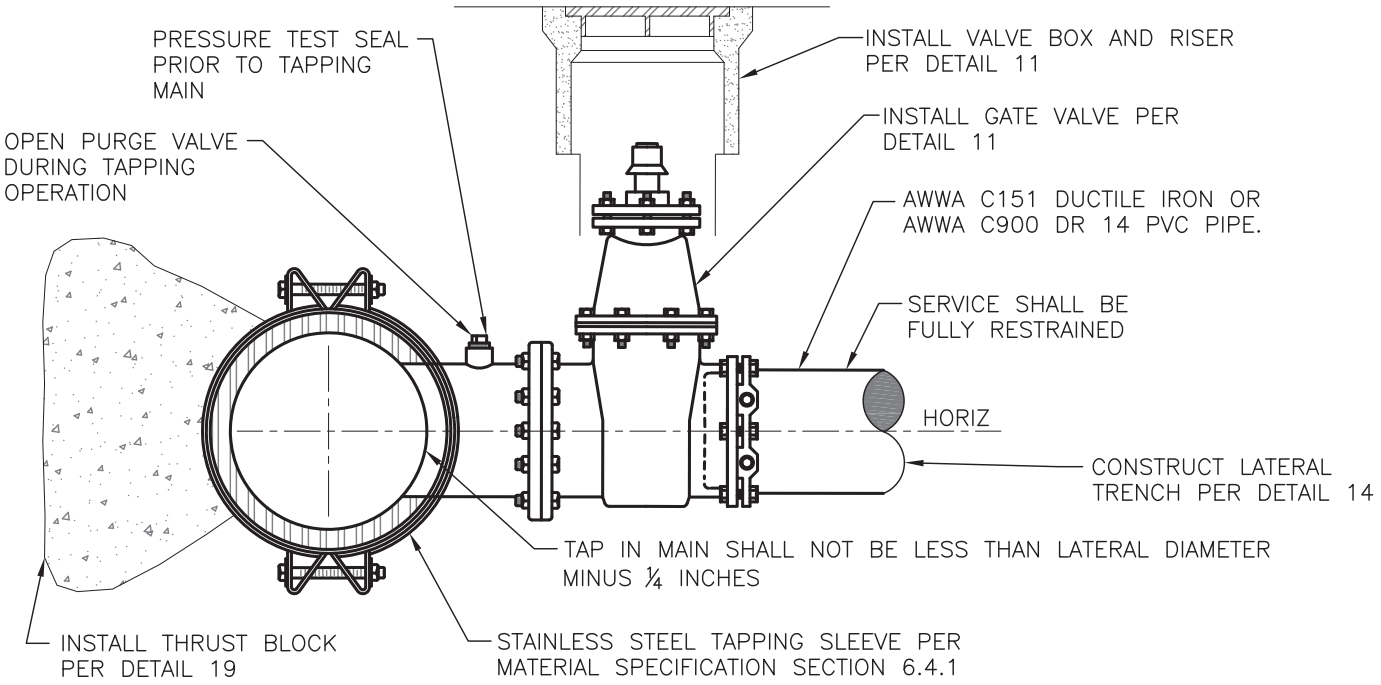
**SUBJECT TO CHANGE

Exhibit H



	DUCTILE IRON	CAST IRON	ASBESTOS CEMENT	POLYVINYL CHLORIDE	WELDED STEEL
STAINLESS STEEL SLEEVE MATERIAL SPECIFICATION 6.5.1	OK	OK	OK	OK	OK
SINGLE WIDE STRAP SADDLE MATERIAL SPECIFICATION 6.5.2	OK	OK	OK	OK	
DUAL STRAP SADDLE MATERIAL SPECIFICATION 6.5.3	OK	OK	OK	OK	
SINGLE STRAP SADDLE MATERIAL SPECIFICATION 6.5.4	OK				

SMALLER THAN 4"



4" AND LARGER

NOTES

1. ALL HOT TAP CONNECTIONS SHALL BE MADE IN THE PRESENCE OF THE ENGINEER.
2. ALL HOT TAP CONNECTIONS SHALL BE AT LEAST 24" AWAY FROM ANY JOINT OR FITTING AND 18" AWAY FROM ANY OTHER TAP.
3. CONTRACTOR SHALL OPEN PURGE VALVE DURING TAPPING OPERATION.
4. SERVICE PIPING AND FITTING DIAMETERS SHALL MEET OR EXCEED THE SERVICE SIZE DESIGNATED BY THE ENGINEER.
5. TAPPING BIT SHALL BE OF THE HOLE–SAW OR SHELL TYPE.
6. COUPON OR "COOKIE" SHALL BE SUBMITTED TO THE ENGINEER UPON REQUEST.
7. IF COUPON IS LOST, CONTRACTOR SHALL FULLY OPEN SERVICE IN THE PRESENCE OF THE ENGINEER TO VERIFY FLOW.
8. CONTRACTOR SHALL COAT TAPPING SADDLE, ALL FASTENERS AND SERVICE LINE WITH BITUMASTIC AND/OR ENCASE IN POLYETHYLENE IF DIRECTED BY THE ENGINEER.
9. CONNECTIONS TO MAINS SMALLER THAN 4" SHALL BE SPECIFIED ON A CASE BY CASE BASIS.
10. SERVICE SHALL BE DISINFECTED IF REQUIRED BY THE ENGINEER.

CITY OF SANTA CRUZ

WATER DEPARTMENT
CITY OF SANTA CRUZ, CALIFORNIA

DETAIL 1

SERVICE CONNECTION

NOT TO SCALE

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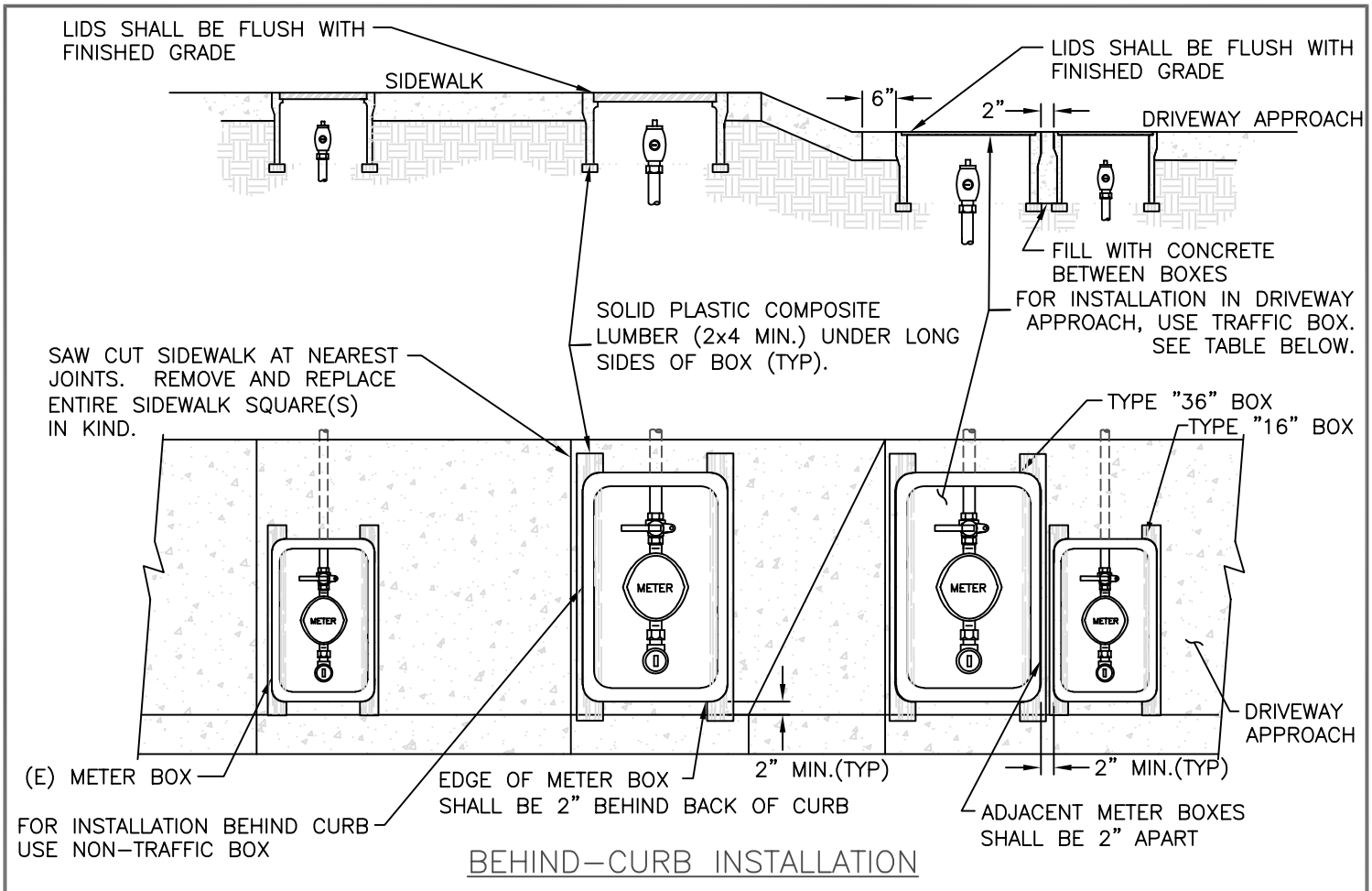
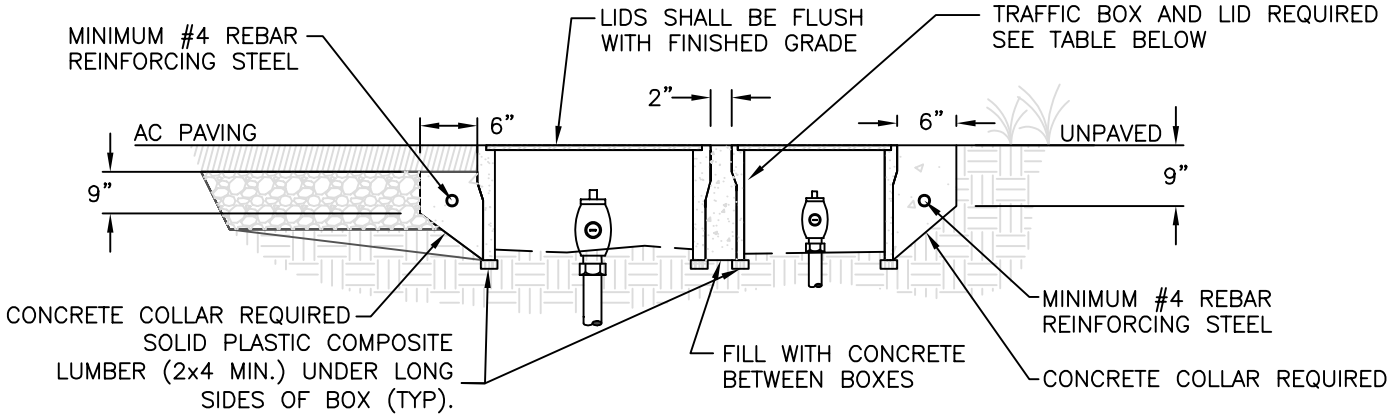


BEHIND-CURB INSTALLATION



INSTALLATION IN AREAS WITHOUT CURB

BOX TYPE	NON-TRAFFIC (SCWD TO SUPPLY LID)	TRAFFIC (CONTRACTOR TO SUPPLY LID)
TYPE "16"	CHRISTY B16BOX	CHRISTY B1324 BOX / B1234-51JH LID
TYPE "36"	CHRISTY N36BOX	CHRISTY B1730 BOX / B1730-51JH LID

NOTES
1. SEE LOCAL PUBLIC WORKS JURISDICTION'S STANDARD DETAILS FOR SIDEWALK CONSTRUCTION REQUIREMENTS.

CITY OF SANTA CRUZ

WATER DEPARTMENT
CITY OF SANTA CRUZ, CALIFORNIA

DETAIL 2

METER BOX INSTALLATION

NOT TO SCALE

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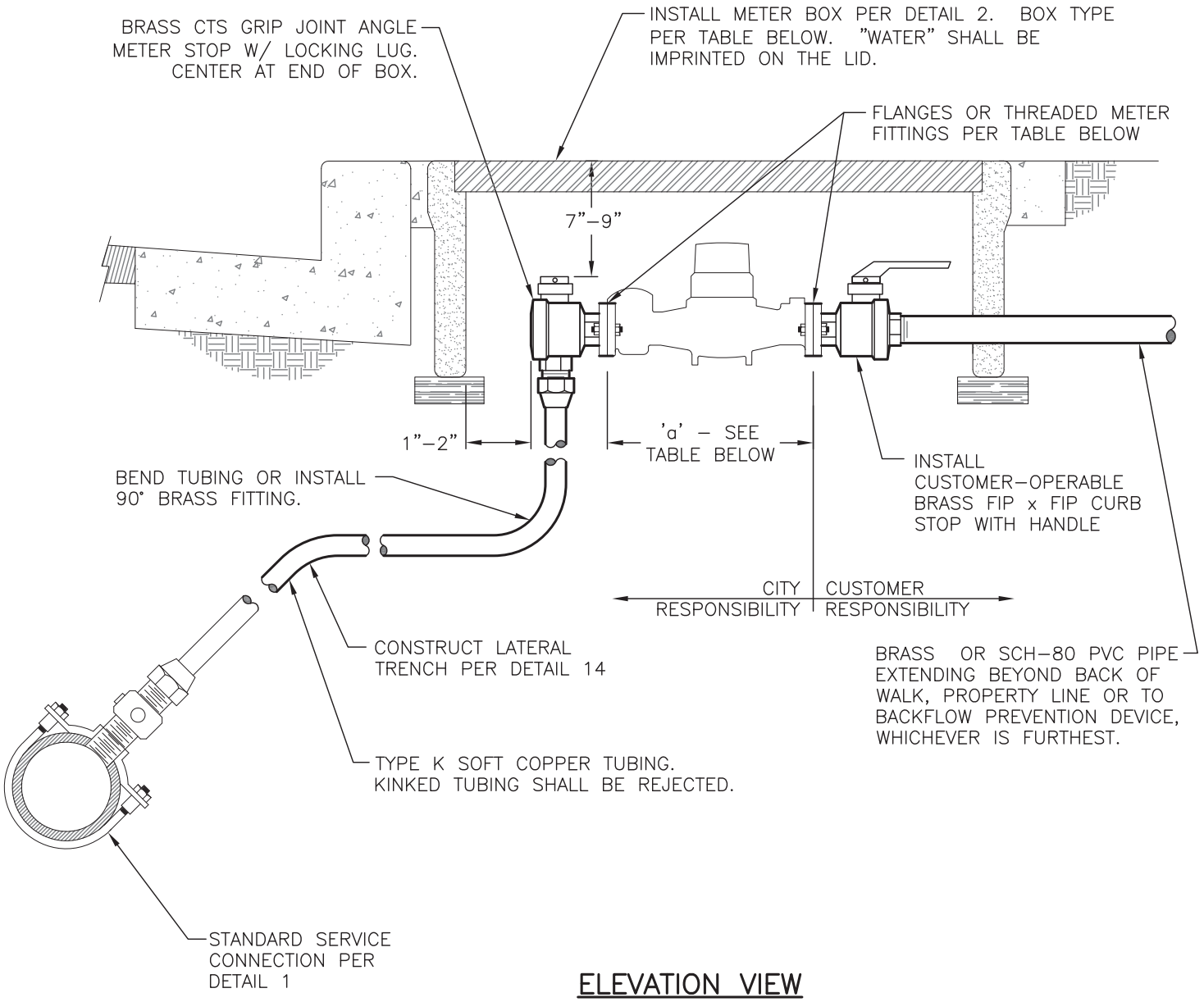

ELEVATION VIEW

METER SIZE AND TYPE (ASSIGNED BY SCWD)	BOX TYPE (SEE DETAIL 2)	METER LENGTH, a
⅝" THREADED	"16"	7¾"
¾" THREADED	"16"	7¾"
1" THREADED	"16"	11"
1½" FLANGED	"36"	13"
2" FLANGED	"36"	15¼"

NOTES

1. BRASS FITTINGS, VALVES AND PIPE SHALL CONSIST OF LOW–LEAD BRASS ALLOY AND SHALL HAVE A MINIMUM WORKING PRESSURE OF 150 PSI.
2. METER WILL BE FURNISHED AND INSTALLED BY CITY FORCES
3. A BACKFLOW PREVENTION ASSEMBLY SHALL BE INSTALLED PER DETAIL 8 IF REQUIRED BY THE ENGINEER.

CITY OF SANTA CRUZ

WATER DEPARTMENT
CITY OF SANTA CRUZ, CALIFORNIA

DETAIL 5

2–INCH AND SMALLER SERVICE INSTALLATION

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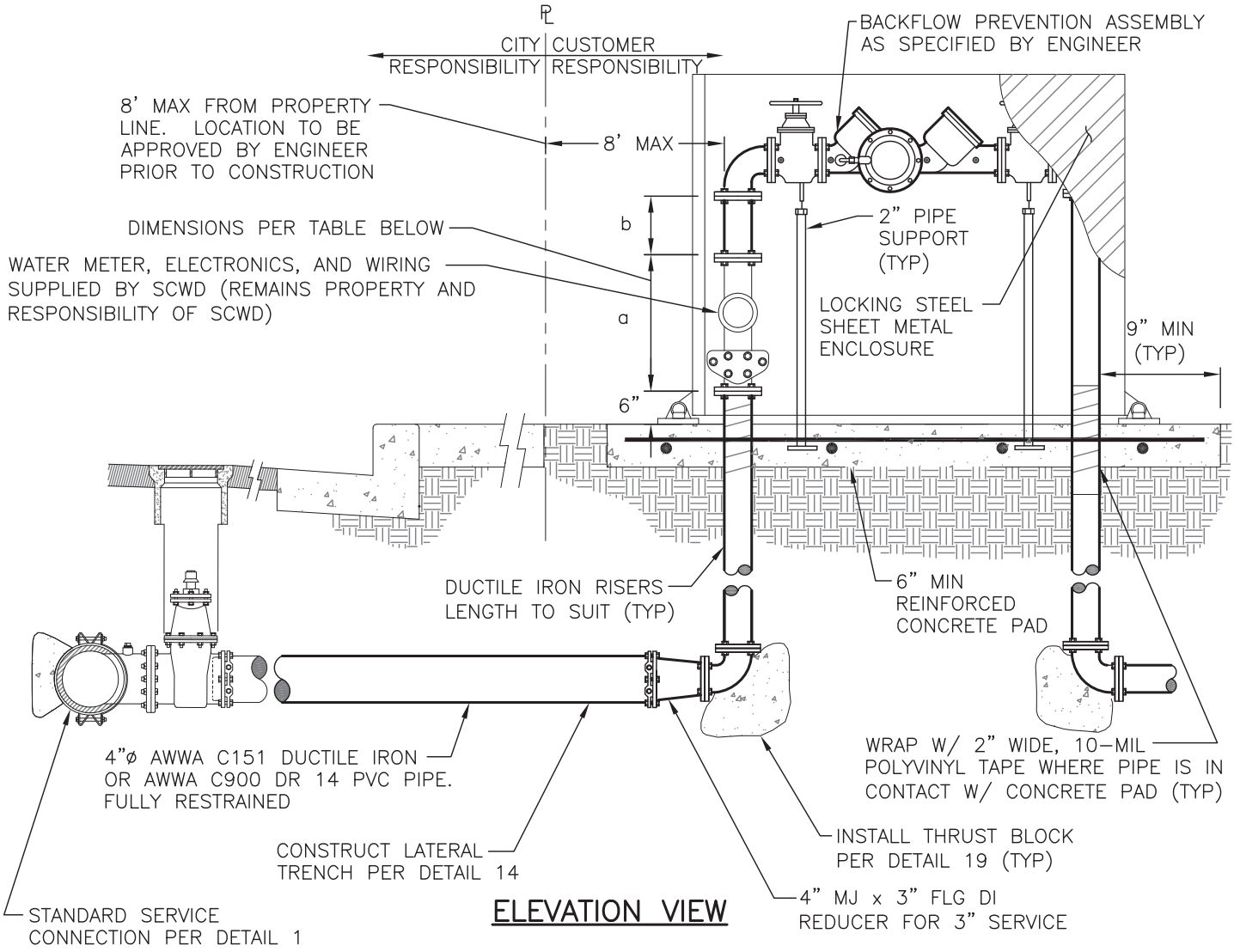
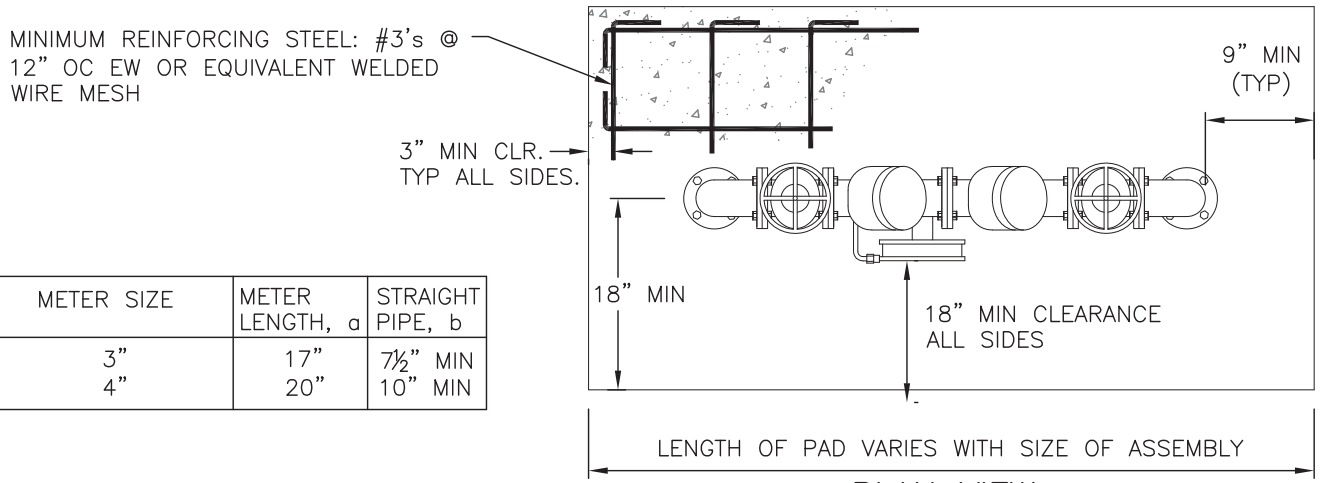


ELEVATION VIEW



PLAN VIEW

METER SIZE	METER LENGTH, a	STRAIGHT PIPE, b
3"	17"	7½" MIN
4"	20"	10" MIN

NOTES

1. LOCATION OF ASSEMBLY SHALL BE APPROVED BY THE ENGINEER PRIOR TO INSTALLATION
2. ALTERNATE CONFIGURATION WITH METER IN-LINE WITH BACKFLOW ASSEMBLY MAY BE USED AT THE DISCRETION OF THE ENGINEER
3. INSTALL TRAFFIC BOLLARD(S) PER DETAIL 20 IF REQUIRED BY ENGINEER

CITY OF SANTA CRUZ

WATER DEPARTMENT
CITY OF SANTA CRUZ, CALIFORNIA

DETAIL 6

3-INCH OR 4-INCH SERVICE INSTALLATION

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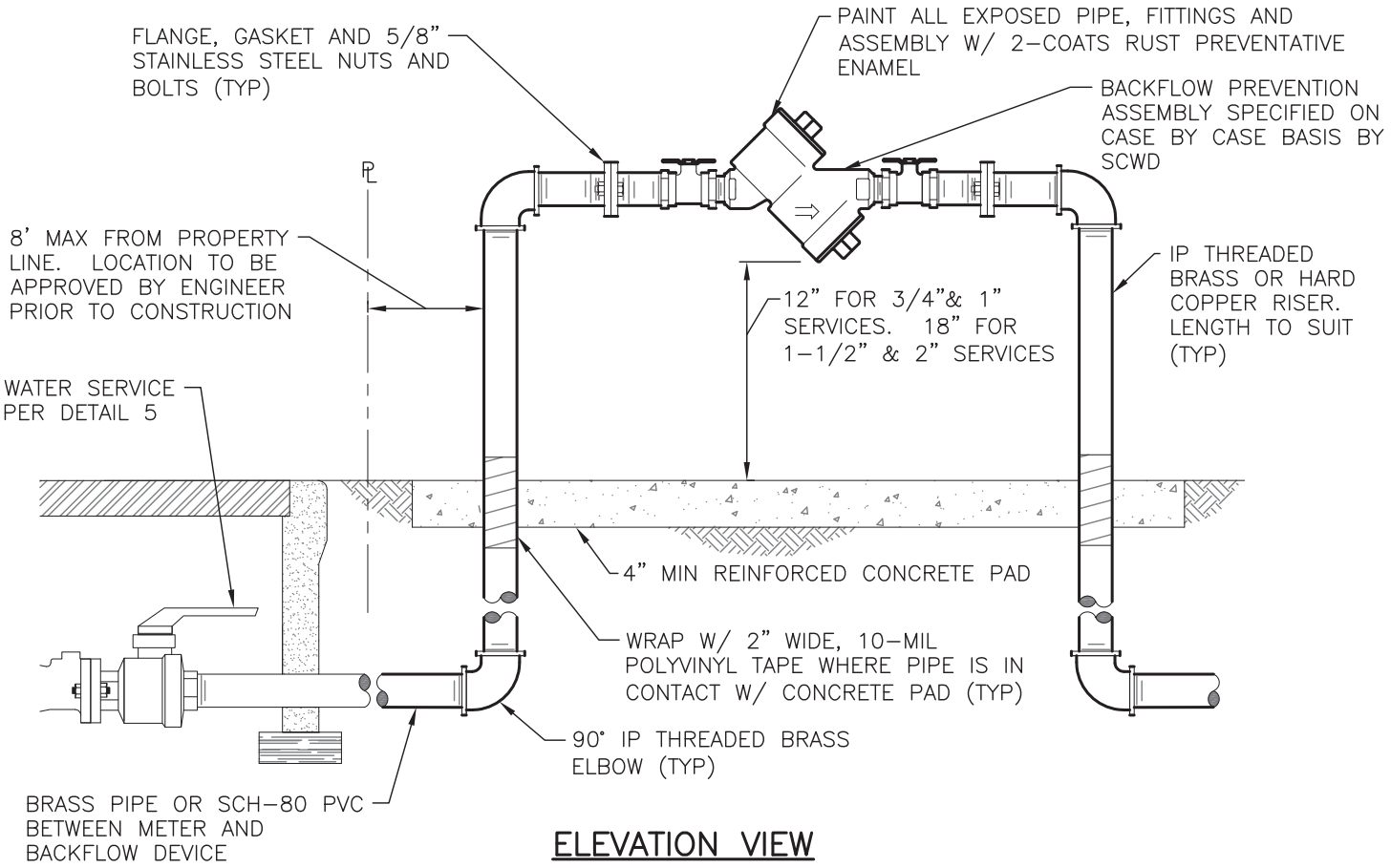
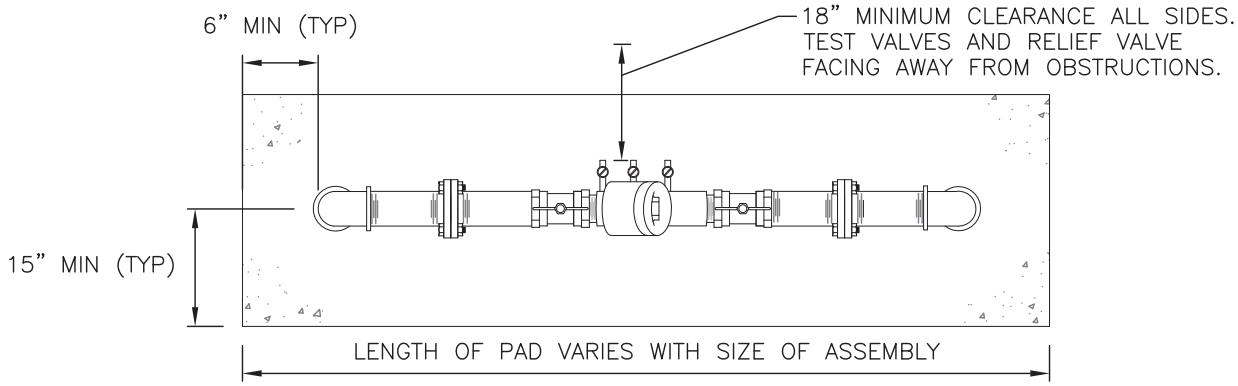


ELEVATION VIEW



PLAN VIEW

NOTES

1. APPROVED BACKFLOW ASSEMBLY SHALL BE INSTALLED SUCH THAT IT IS READILY ACCESSIBLE FOR REPAIR AND INSPECTION.
2. BRASS FITTINGS, VALVES AND PIPE SHALL CONSIST OF LOW-LEAD BRASS ALLOY AND SHALL HAVE A MINIMUM WORKING PRESSURE OF 150 PSI.
3. BRASS OR PLASTIC PLUGS SHALL BE INSTALLED ON ALL TEST PORTS.
4. ALL ABOVE GROUND PIPE, FITTINGS AND ASSEMBLY SHOULD BE PAINTED WITH TWO COATS OF ENAMEL.
5. AN ENCLOSURE OR CAGE MAY BE INSTALLED AT THE OPTION OF THE PROPERTY OWNER.

CITY OF SANTA CRUZ

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CITY OF SANTA CRUZ, CALIFORNIA

DETAIL 8
2-INCH AND SMALLER BACKFLOW PREVENTION ASSEMBLY INSTALLATION

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RCF 137391

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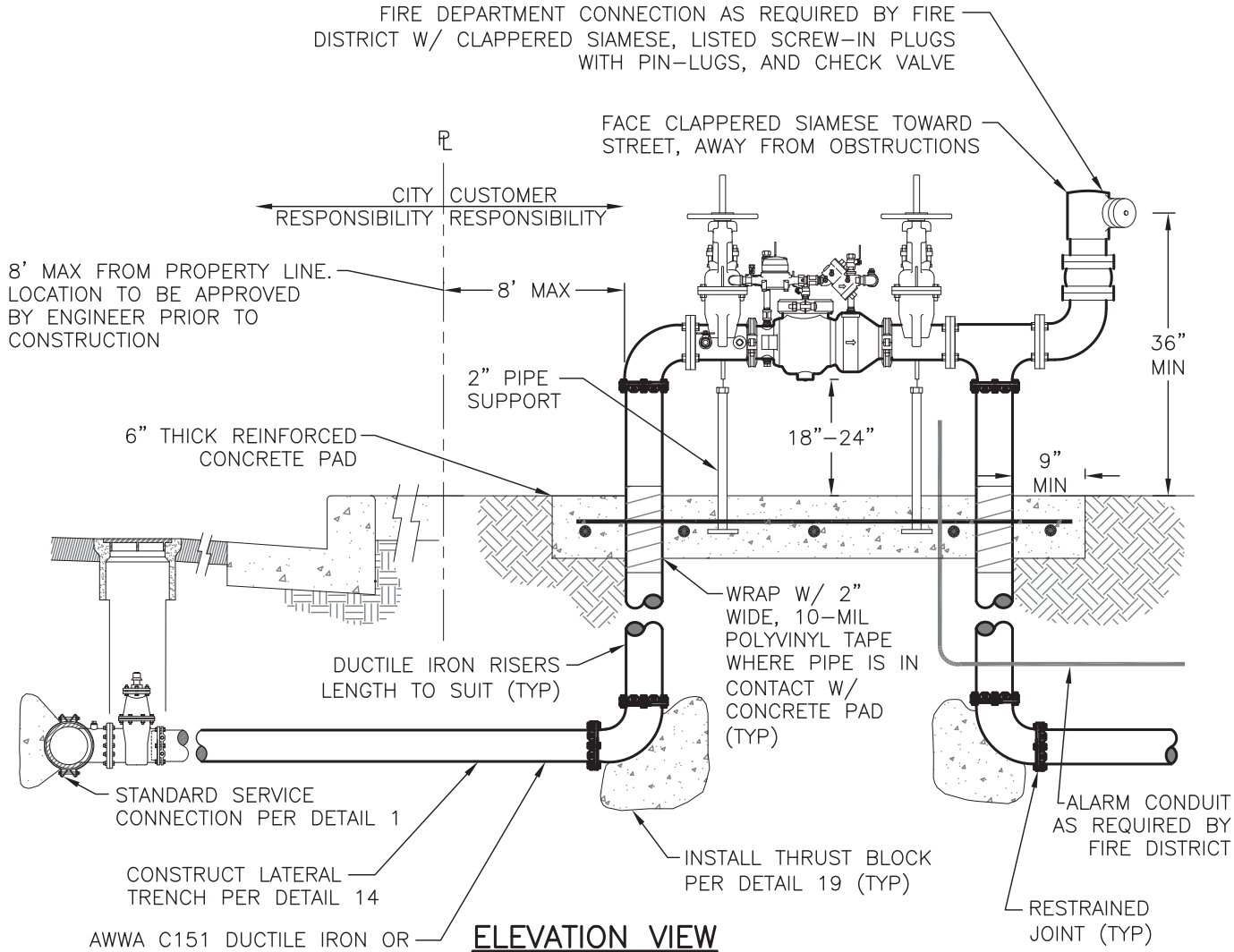
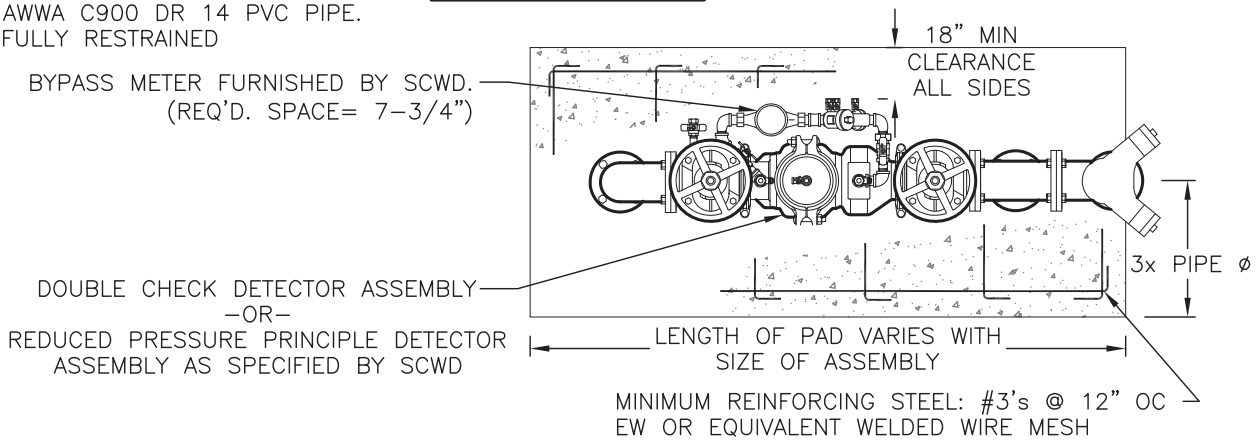


ELEVATION VIEW



PLAN VIEW

NOTES

1. REFER TO PROJECT CIVIL PLAN FOR REQUIRED TYPE OF DEVICE OR CALL SCWD AT (831) 420–5210 FOR SPECIFIED TYPE PRIOR TO INSTALLATION.
2. O.S. AND Y. VALVES SHALL BE EQUIPPED WITH TAMPER PROOF ALARM DEVICES. VALVES ARE TO BE CHAINED TOGETHER IN THE OPEN POSITION WITH A BREAK–AWAY CHAIN OR AS REQUIRED BY FIRE DISTRICT.
3. ASSEMBLY TO BE PAINTED RED OR OTHER COLOR AS SPECIFIED BY FIRE DISTRICT.
4. DEVICE MUST BE INSTALLED SO THAT IT IS READILY ACCESSIBLE FOR TESTING AND MAINTENANCE. LOCATIONS MUST BE APPROVED BY SCWD PRIOR TO INSTALLATION.
5. INSTALL TRAFFIC BOLLARD(S) PER DETAIL 20 IF REQUIRED BY ENGINEER
6. BRASS OR PLASTIC PLUGS SHALL BE INSTALLED ON ALL TEST PORTS.

CITY OF SANTA CRUZ

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DETAIL 9

STANDARD 4–INCH AND LARGER FIRE SERVICE INSTALLATION

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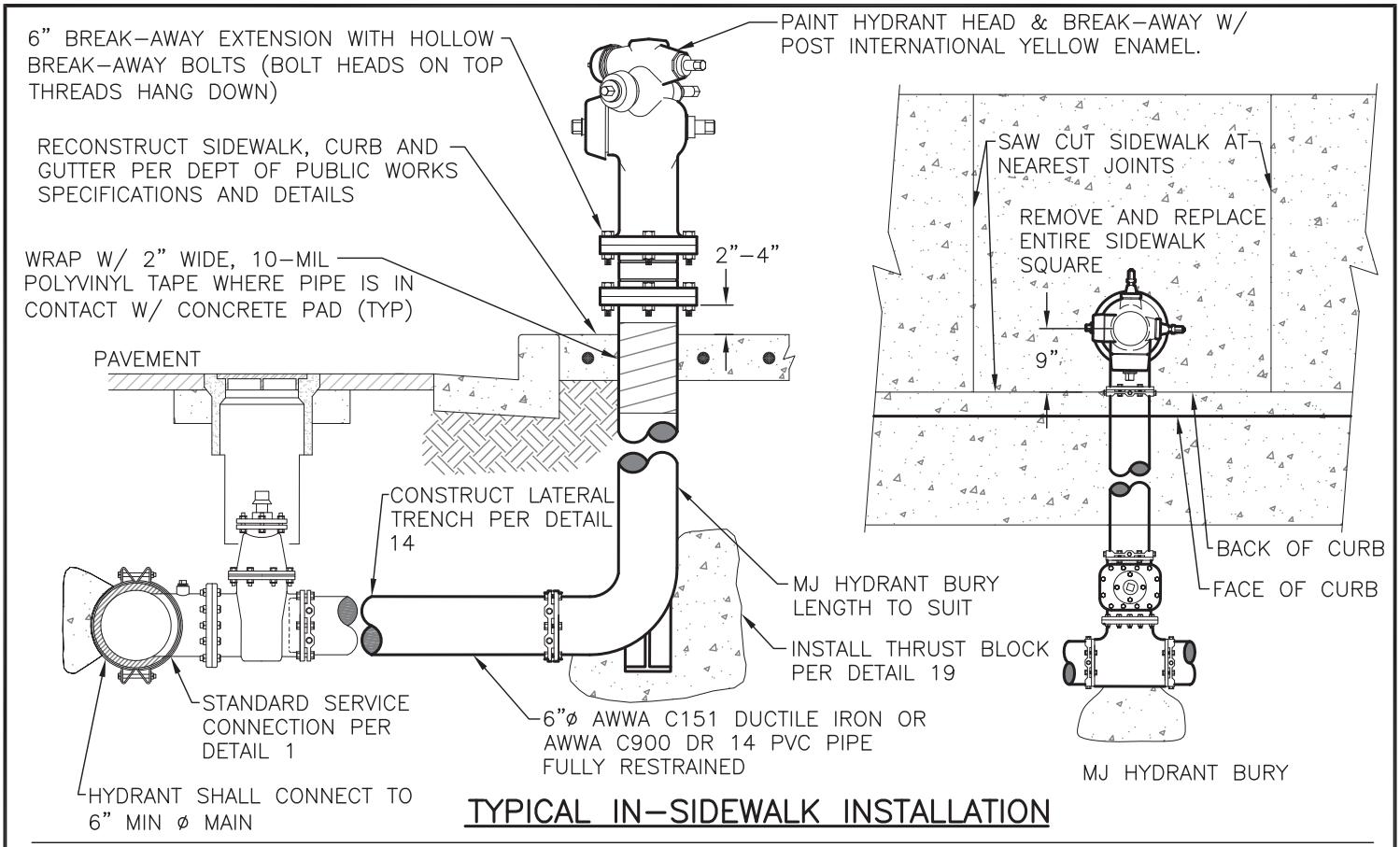
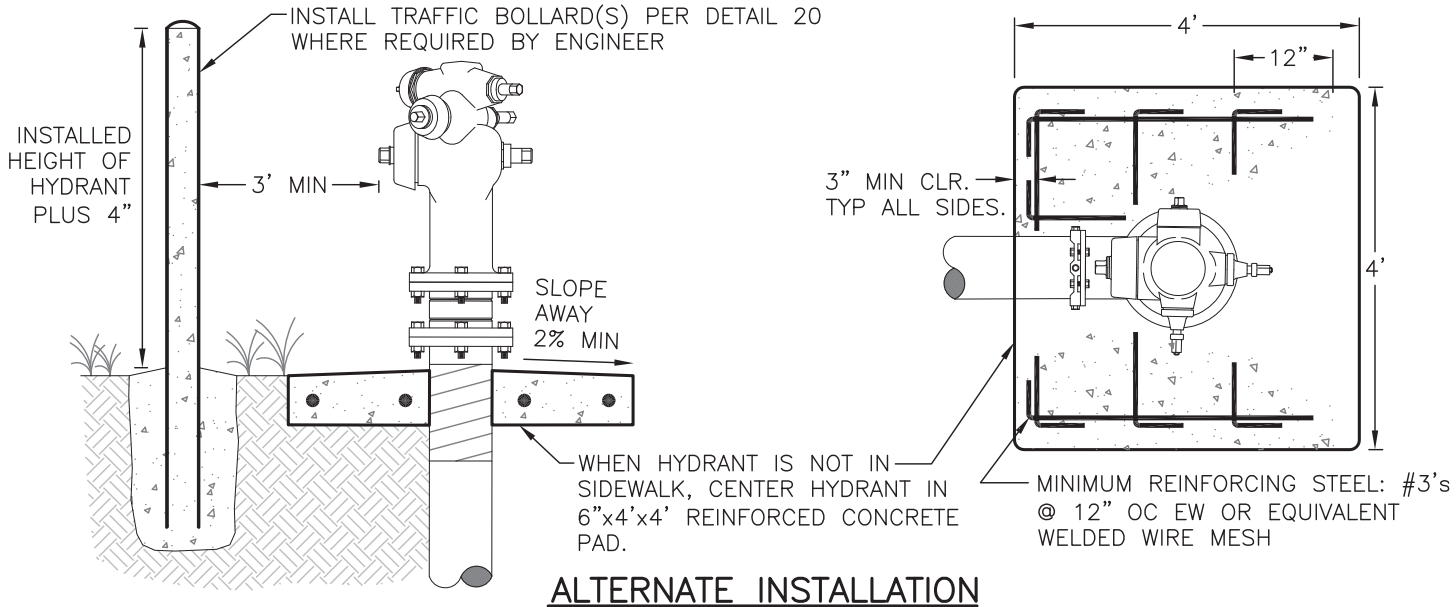


TYPICAL IN-SIDEWALK INSTALLATION



ALTERNATE INSTALLATION

NOTES

1. HYDRANT SHALL BE 6" "STEAMER" TYPE; CLOW MODEL 2060, JONES MODEL J-3760, OR APPROVED EQUAL.
2. REMOVE HYDRANT OUTLET CAP CHAINS PERMANENTLY.
3. HYDRANT SHALL BE COVERED WITH BURLAP SACK OR APPROVED ORANGE BAG WHEN NOT IN SERVICE.
4. FIRE HYDRANT LOCATION SHALL BE APPROVED ON A CASE BY CASE BASIS PRIOR TO CONSTRUCTION AND SHALL INCLUDE FIRE AGENCY APPROVED PLANS, CITY OR COUNTY ENCROACHMENT PERMIT, AND FIELD VERIFICATION BY THE APPROPRIATE FIRE AGENCY, CITY OR COUNTY PUBLIC WORKS DEPARTMENT AND SCWD, PER SCWD HYDRANT INSTALLATION PERMIT REQUIREMENTS PRIOR TO CONSTRUCTION.

CITY OF SANTA CRUZ

WATER DEPARTMENT
CITY OF SANTA CRUZ, CALIFORNIA

DETAIL 10

FIRE HYDRANT INSTALLATION

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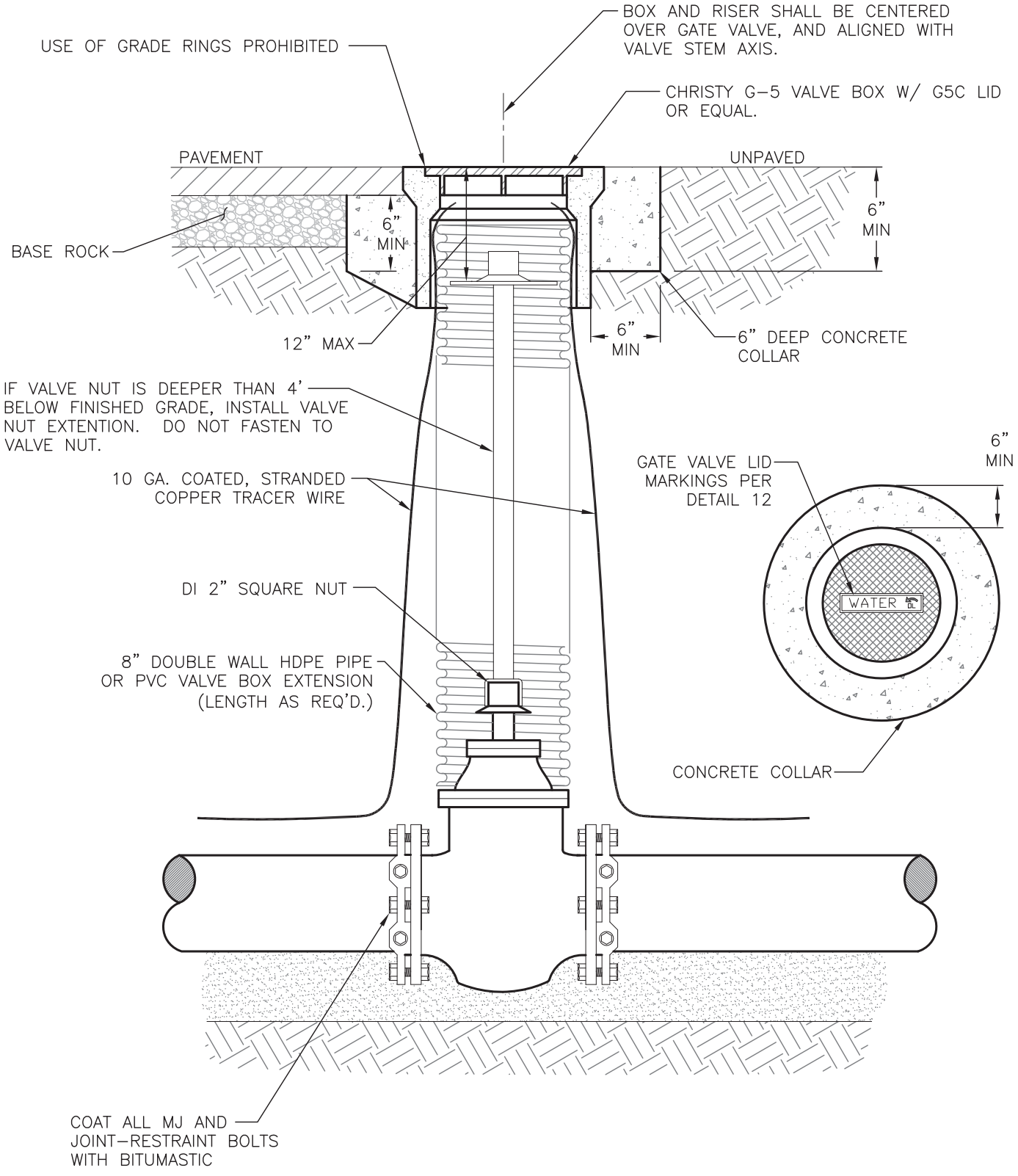

NOTES

1. VALVE BOX LID SHALL BE OILED PRIOR TO PAVING OR CLEANING TO ENSURE THAT LID MARKINGS ARE LEGIBLE.
2. INSTALL VALVE BOX LID FLUSH WITH FINAL PAVING OR GROUND SURFACE.
3. INSTALL BLOCKING UNDER VALVE IF REQUIRED.

CITY OF SANTA CRUZ

WATER DEPARTMENT
CITY OF SANTA CRUZ, CALIFORNIA

DETAIL 11

GATE VALVE INSTALLATION

NOT TO SCALE

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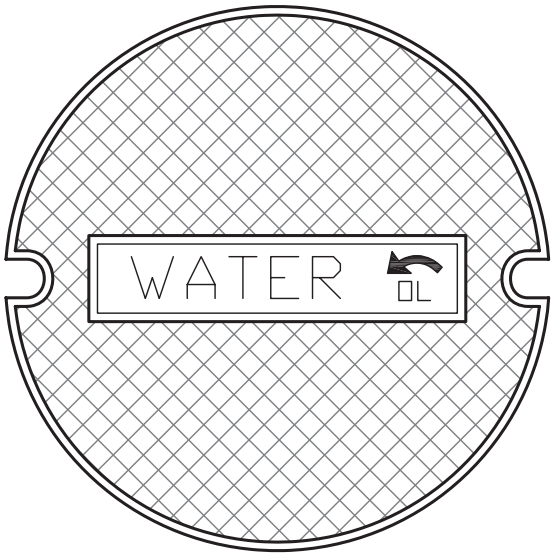
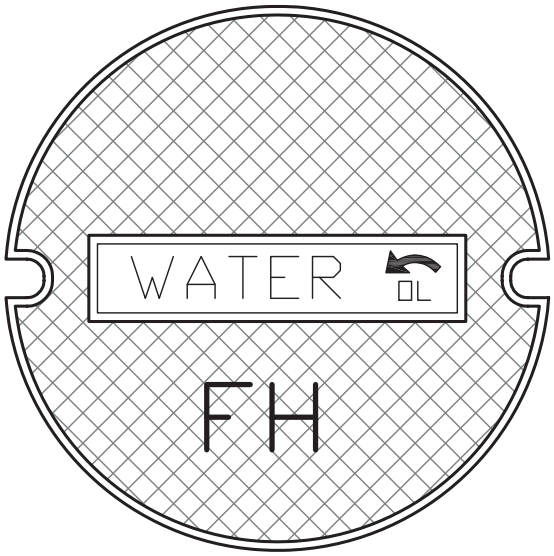


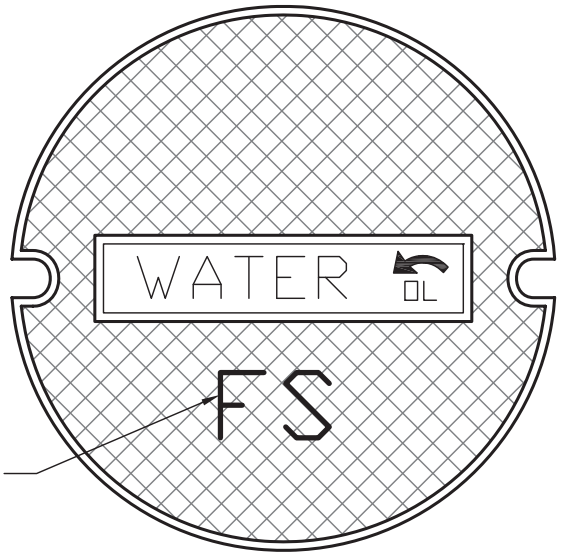
STANDARD VALVE BOX LID
FOR MAIN LINE VALVES

STANDARD VALVE BOX LID
FOR ALL NORMALLY CLOSED
ZONE VALVES



STANDARD VALVE BOX LID FOR
ALL FIRE HYDRANT VALVES

WELD MARKINGS ON
TO LID (TYP)



STANDARD VALVE BOX LID
FOR ALL FIRE SERVICES

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CITY OF SANTA CRUZ, CALIFORNIA

DETAIL 12

VALVE BOX LID MARKINGS

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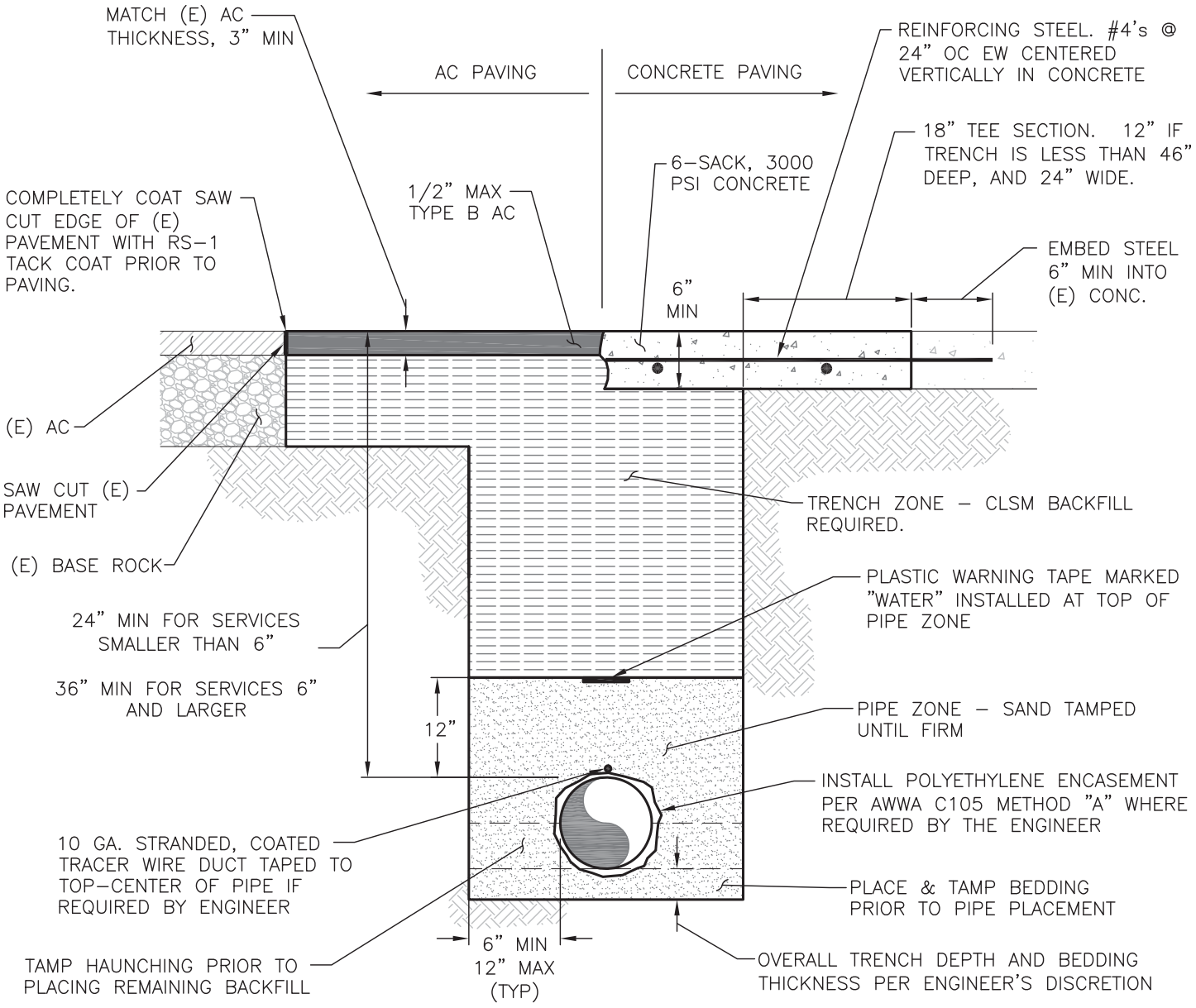

STANDARD SERVICE LATERAL TRENCH

NOTES

1. IF ANY PORTION OF (E) PAVEMENT WITHIN SAWCUT LIMITS IS CONCRETE AT THE SURFACE, ENTIRE TRENCH SHALL BE RE-PAVED WITH CONCRETE AS SHOWN.
2. WHERE WATER SERVICES 6" AND LARGER CANNOT MEET MINIMUM COVER REQUIREMENTS, THE ENGINEER MAY APPROVE ALTERNATE INSTALLATION PER DETAIL 16.
3. ALL JOINTS ON SERVICE LATERALS SHALL BE RESTRAINED.

CITY OF SANTA CRUZ

WATER DEPARTMENT
CITY OF SANTA CRUZ, CALIFORNIA

DETAIL 14

STANDARD SERVICE LATERAL TRENCH

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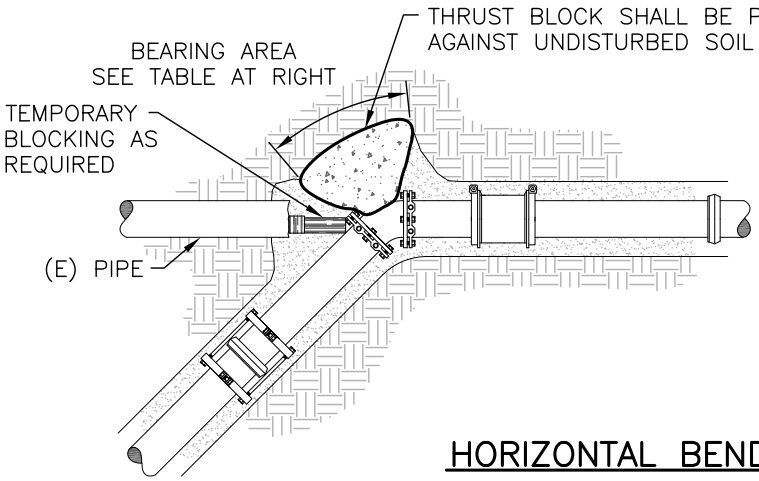
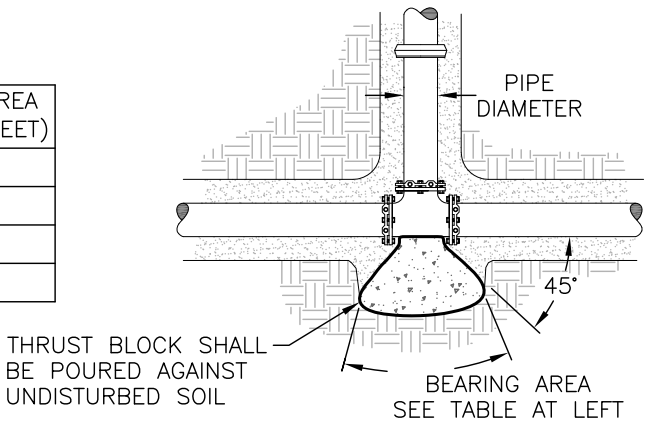


HORIZONTAL BEND

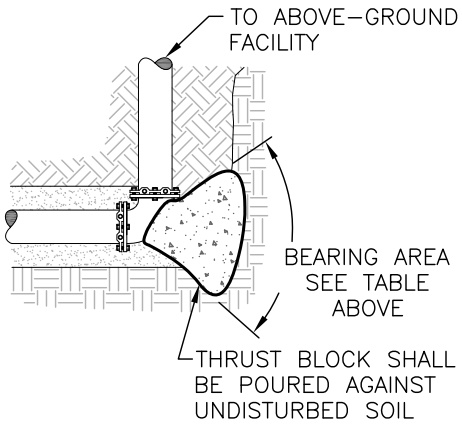
THRUST BLOCK BEARING AREA (SQUARE FEET)

		FITTING DEFLECTION			
		11 1/4°	22 1/2°	45°	90°
PIPE DIAMETER	4"	1	1	2	2
	6"	1	1	2	4
	8"	1	2	4	7
	10"	2	3	6	11

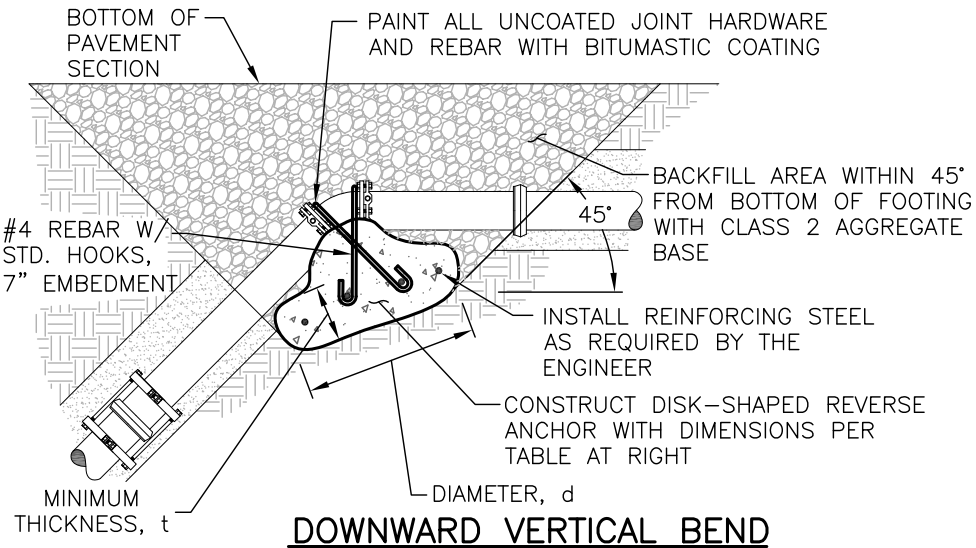
PIPE DIAMETER	BEARING AREA (SQUARE FEET)
4"	2
6"	3
8"	5
10"	8



TEE



UPWARD VERTICAL BEND



DOWNWARD VERTICAL BEND

MINIMUM REVERSE ANCHOR DIMENSIONS (FEET)

d / t		FITTING DEFLECTION	
		22 1/2°	45°
PIPE DIAMETER	6"	2 / 0.5	3 / 0.5
	8"	3 / 0.5	4 / 0.8
	10"	3 / 0.5	5.5 / 2

NOTES
1. CONCRETE THRUST BLOCKS SHALL BE INSTALLED WHEN INDICATED BY THE CONTRACT DOCUMENTS OR AT THE DISCRETION OF THE ENGINEER.
2. THRUST BLOCKING IS REQUIRED WHERE IT IS UNKNOWN IF PIPE IS RESTRAINED, SUCH AS AT A CONNECTION TO EXISTING PIPE.
3. ALL CONCRETE SHALL BE 3000 PSI MINIMUM 28 DAYS COMPRESSIVE STRENGTH.
4. FOR PIPELINES LARGER THAN 10" IN DIAMETER, PIPELINES INSTALLED AT DEPTHS LESS THAN 36 INCHES, OR IN POOR SOILS, THRUST BLOCK DESIGN SHALL BE APPROVED BY THE ENGINEER ON A CASE BY CASE BASIS.

CITY OF SANTA CRUZ

WATER DEPARTMENT
CITY OF SANTA CRUZ, CALIFORNIA

DETAIL 19

THRUST BLOCK INSTALLATION

NOT TO SCALE

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Exhibit H

Docusign Envelope ID: E6F72EBC-A449-420C-AC31-35B92D3B1579

SANTA CRUZ COUNTY SANITATION DISTRICT
701 OCEAN STREET, SUITE 410 · SANTA CRUZ, CA · 95060-4073
(831) 454-2160 · FAX (831) 454-2089 · TDD: (831) 454-2123 · WWW.SCCSD.US
MATT MACHADO, DISTRICT ENGINEER

MARCH 12, 2025

CLAY TOOMBS
WORKBENCH
189 WALNUT AVENUE
SANTA CRUZ, CA 95060

SUBJECT:	SEWER AVAILABILITY AND DISTRICT'S CONDITIONS OF SERVICE FOR THE FOLLOWING PROPOSED DEVELOPMENT
APN:	025-013-37
PARCEL ADDRESS:	3500 PAUL SWEET ROAD
PROJECT DESCRIPTION:	DEMOLISH EXISTING RESIDENCE, CONSTRUCT NEW DEVELOPMENT CONSISTING OF 105 DWELLING UNITS

Dear Mr. Toombs:

The District has received your inquiry regarding sewer service availability for the subject parcel(s). Sewer service is available in County sewer main EB12-EB54 adjacent to this parcel for the subject development.

No downstream capacity problem or other issue is known at this time. However, downstream sewer requirements will again be studied at time of Planning Permit review, at which time the District reserves the right to add or modify downstream sewer requirements.

This notice is valid for one year from the date of this letter. If, after this time frame, this project has not yet received approval from the Planning Department, then this determination of availability will be considered to have expired. If that occurs or is likely to occur prior to an upcoming submittal or public hearing, please call us ahead of time for a new letter. At that time, we can evaluate the then proposed use, improvements, and downstream capacity, and provide a new letter.

Also, for your reference, we have attached a list of common items required during the review of sanitation projects. Thank you for your inquiry. If you have any questions, please call Bryan Wardlow at (831) 454-2160.

Yours truly,
MATT MACHADO
District Engineer

By: DocuSigned by: 528D647137C44D4...
Ashleigh Trujillo
Sanitation Engineer

BW/arg:25-024.docx
Copy to: Planning Department

Exhibit I

Docusign Envelope ID: E6F72EBC-A449-420C-AC31-35B92D3B1579

Common Items Required During the Review of Sanitation Projects

What to show on the drawings: When you begin the design process, please show:

On the plot/site/utility plan:

1. Location of any **existing** on-site sewer lateral(s), clean-out(s), and connection(s) to existing public sewer on the site (plot) plan.

2. Location of any **proposed** on-site sewer lateral(s), clean-out(s), and connection(s) to existing public sewer on the site (plot) plan.

   Place a note, *"Existing" or "(E)"*,on each existing item that is to be removed.
   Place a note, *"To be removed"*, on each existing item that is to be removed.
   Place a note, *"New" or "(N)"*, on each item that is to be new.

On a floor plan:

1. All plumbing fixtures both existing and new (label *"(E)"* or "*(N)*") on a floor plan of the entire building. Completely describe all plumbing fixtures according to table T-702.1 of the California Plumbing Code. (Sanitation District Code sections 7.04.040 and 7.04.430)

Design and Construction Standards
The project sewer design and connection of the project to the Santa Cruz County Sanitation District system will be required to conform to the County of Santa Cruz Design Criteria (CDC) Part 4, Sanitary Sewer Design, February 2017 edition. Reference for County Design Criteria:
http://www.dpw.co.santa-cruz.ca.us/Portals/19/pdfs/Design%20Crit/DESIGNCRITERIA.pdf

Demolition and Sewer Abandonment
If the proposed plans will involve some demolition, the existing sewer lateral(s) must be properly abandoned (including inspection by District) prior to issuance of demolition permit or relocation or disconnection of structure. An abandonment permit (either temporary or permanent) for disconnection work must be obtained from the District. This process is often overlooked until the last minute and can result in unnecessary delays, and you are encouraged to plan for the relatively short time and small expense to fulfill this requirement. There is no charge for either permit or inspection. (Sanitation District Code section 7.04.410)

New Connection
If the proposed plans will involve one or more new sewer connections, we must issue a new sewer connection permit for each new connection. The final connection charges can be determined only after the District and, as needed, other Department of Public Works divisions have reviewed and approved the final engineered sewer improvement plans. (Sanitation District Code section 7.04.410)

Tentative, parcel, or final map required
When any new tentative, parcel, or final map is required, please show the following on the improvement plans:

1. All adjacent or impacted roads and easements,
2. All on- and off-site sewer improvements needed to provide service to each lot or unit proposed.

The plans must conform to the County's "Design Criteria."

If a tentative, parcel, or final map is NOT required, please provide to the District written proof of recordation (in the form of copies of the recorded documents) of any and all existing or proposed easement(s).

Exhibit I

Docusign Envelope ID: E6F72EBC-A449-420C-AC31-35B92D3B1579

Non-residential water use
Provide to the District a written estimate the amount of domestic water (average gallons per day) that will be used on this parcel after it is fully developed. You may need to engage an engineer or other knowledgeable person to provide an accurate estimate. This information will be used in the determination of both fees and waste pretreatment requirements. Connection permits can only be issued after these requirements are determined. (Sanitation District Code section 5.04.100)

Multi-unit development with a private collector line
If the development will require a private collector line serving several separate units or parcels, which will be individually and separately owned, prior to any land split or building permit, the applicant must form a homeowners' association with ownership and maintenance responsibilities for all on-site sewers for this project. Please reference this homeowner's association directly on the tentative map and final map, as well as in the Association's recorded CC&R's. Please record those CC&Rs, and provide a copy of the recorded documents, with proof of recordation, to the District prior to the filing of the final map.

Public sewer (existing) on the property
If a public sewer main is located on the property, any improvements in the easement will need to be removed if the District needs to replace the sewer main. It will be a condition of any development permit that the existing sewer system line and easement shall be surveyed and plotted on the site plan for the development or building permit application. No permanent improvements may be constructed within the easement boundaries. (Sanitation District Code section 7.04.430)

Backflow prevention device
A backflow preventive device may be required. While this determination is often made “in the field” at the time of installation, if you are engaging a surveyor, civil engineer, or knowledgeable contractor, there is nothing to prevent you from making that determination while in the design process. (Sanitation District Code section 7.04.100 and 7.04.375.A.4)

County of Santa Cruz

Department Of Community Development and Infrastructure

701 OCEAN STREET, FOURTH FLOOR, SANTA CRUZ, CA 95060-4070
Planning (831) 454-2580 Public Works (831) 454-2160
https://cdi.santacruzcountyca.gov/

Clay Toombs
Workbench
clay@workbenchbuilt.com

October 15, 2025

Subject: 3500 Paul Sweet Road Biotic Review and Conditioned Biotic Approval
APN: 025-013-37
Application #: REV251035

Attachment 1. Arborist Report
Attachment 2. Biotic Report
Attachment 3. Vegetation Communities and Land Cover memo

Dear Mr. Toombs,

The Planning Division received and reviewed an Arborist Report and Tree Protection Plan dated September 11, 2025 prepared by Aesculus Arboricultural Consulting, a Biotic Report dated March 4, 2025 prepared by EMC Planning Group, and a Vegetation Communities and Land Cover Memo dated September 2025 prepared by Dudek for APN 025-013-37. A Biotic Report Review was required because of the potential for sensitive habitats and protected species on this parcel where construction of a six-story 105-unit multifamily building is proposed. These reports are included in Attachments 1-3.

This Biotic Review evaluates habitat conditions on the parcel for special-status species with potential to occur and assesses presence/absence of sensitive habitats on this parcel. The Vegetation Communities and Land Cover Memo describes and maps vegetation communities on the parcel. The arborist report identifies and evaluates existing trees on the property and adjacent properties and assesses potential tree impacts resulting from the proposed project.

The proposed project includes demolition of an existing abandoned residence and several auxiliary structures, site grading, construction of a single six-story building, and installation of associated site improvements. All vegetation on the property is proposed for removal as part of this project.

The proposed project includes demolition of an existing abandoned residence and several auxiliary structures, site grading, construction of a single six-story building, and installation of associated site improvements. The project proposes to remove 39 trees including 20 oak trees. Two of the oak trees proposed for removal (Tree #437 34”dbh, and Tree #446 22”dbh) are located on the neighboring property to the north.

The summary and evaluation below are based on information obtained through review of the attached reports and field observations made by Environmental Planning Staff during a site visit on June 5, 2025. Other sources consulted during this review include the project plans dated March 17, 2025, the California Natural Diversity Data Base (CNDDB), the California Wildlife Habitat Relationships (CWHR) information system, California Fish and Game Code, the USFWS Environmental Online Conservation System (ECOS), the California Native Plant Society Manual of California Vegetation, the National Wetlands Inventory (NWI), Santa Cruz County GIS Maps, and aerial imagery of the project site.

Exhibit J

Baseline Environmental Conditions

The Study Area covered in this Biotic Review includes the entire approximately 0.52-acre parcel. The parcel is currently developed with an unoccupied single-family home and several dilapidated auxiliary structures. The parcel is surrounded by a multi-family residential development to the south and east, the Chaminade Resort and Spa to the north, and a cemetery occurs across Paul Sweet Road to the west.

The 0.52-acre parcel has been heavily impacted by past residential uses especially in the center of the property where the house and auxiliary structures occur. This area is dominated by exotic annual grasses, non-native invasive broadleaf weeds, and introduced ornamental plants. The property boundaries have a moderate tree density and canopy cover. Most of the tree species along the eastern and southern property boundaries are non-native ornamental species. The western boundary of the property, which parallels Paul Sweet Road, has a strip of oak woodland habitat that forms a contiguous canopy with the woodlands on the neighboring parcels. The location and extent of existing natural communities on the parcel are depicted in Figure 1 of the attached Vegetation Communities and Land Cover Memo.

The oak woodland on the parcel composes a tree canopy greater than 10% where *Quercus agrifolia* is the dominant species and makes up greater than 50% of the relative cover in the canopy. The understory is a sparse to intermittent mix of native and non-native shrubs, grasses, and herbaceous species including re-sprouting *poison oak and California blackberry* which are common native shrubs that occur in the understory of in-tact oak woodlands throughout Santa Cruz County. The subject parcel is located on the edge of the urban/rural interface. The oak canopy on the subject parcel is contiguous with the oak canopy on the adjacent parcel to the north which continues farther to the north connecting to a much larger expanse of woodland and forested areas comprised of a mosaic of habitat types including coast live oak woodlands, grasslands, and patches dominated by other woody species like eucalyptus, California bay, and big leaf maple. The presence of other community types located on adjacent parcels and/or dispersed throughout the more expansive wooded areas to the north do not negate the characteristics of coast live oak woodland community composition on this parcel.

The oak woodland on the subject parcel has been disturbed to varying degrees by human activity. The oak woodland occurs parallel to the roadway and is located on a strip of land that was not formerly included as part of APN 025-013-37. It is not clear if this strip of land was maintained historically by the property owners of APN 025-013-37, but the re-sprouting poison oak and dominance of invasive broom in the understory indicates recent disturbance. Some of the oak trees in the canopy are growing directly under a utility line and have been heavily pruned. Other oaks on the property appeared healthy during the June 2025 field visit. The attached Arborist Report confirms that most trees present are in moderate to good health.

Analysis

The Study Area contains potential habitat for special-status species and Oak Woodland. Oak woodlands and habitat for special-status species are considered sensitive under Santa Cruz County's Sensitive Habitat Protection Ordinance (Chapter 16.32).

Rare plant surveys were conducted during the evident and identifiable period for special status plants with potential to occur. No sensitive plant species were observed during surveys. The project is not expected to result in impacts to special-status plants.

The woodlands on this parcel provide potential foraging habitat and protective cover for many varieties of native terrestrial wildlife including the following State Species of Special Concern: San Francisco dusky-footed woodrat, western red bat, and pallid bat. Abandoned buildings may provide habitat for Townsend's big-eared bat and pallid bat. There are also two species of protected bumble bees with potential to occur in the vicinity of the project. Western bumble bee and Croch's bumble bee are both Candidates for listing as endangered under the California Endangered Species Act.

Trees and shrubs and grassland in and adjacent to the study area also provide potential roosting and nesting habitat for other protected bats, birds of prey, and migratory birds. Common bat species are protected under the California Fish and Game Code. Birds of prey and migratory birds are offered protection under the California Fish and Game Code, and the Federal Migratory Bird Treaty Act (MBTA). Under the MBTA, it is "unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill" a migratory bird unless and except as permitted by regulations.

The parcel is located on the edge of the urban/rural interface and the environmental conditions of the site have been heavily influenced by past residential uses. The trees on the property are also part of the urban tree canopy which in addition to providing habitat and protective cover for many varieties of native terrestrial wildlife as well as shade and aesthetic value to humans. Urban forests play an essential role in decarbonization and other climate adaptation strategies by lowering the temperature in urban neighborhoods, reducing energy use, decreasing the concentration of CO2 in the atmosphere (sequestering and storing carbon), and emitting oxygen as a by-product of photosynthesis. Increasing the County's urban tree canopy is a key adaptation strategy outlined in the 2022 Santa Cruz County Climate Action and Adaptation Plan (CAAP).

Santa Cruz County values fostering high quality, healthy environments for inhabitants and has developed design standards intended to foster new development while integrating with existing neighborhoods and protecting natural resources. Specific design standards are imbedded into our County Code (SCCC Section 13.11.070) intended to ensure that new developments are designed to be compatible with the surrounding environment and to reduce impacts of new development on adjacent properties. By requiring that existing natural features such as significant groups of trees and existing mature trees are incorporated into site plans and landscape design, the County ensures that communities continue to grow in a way that aligns with the existing character of each location and fosters healthy environments for all inhabitants. Even projects that are exempt by statute from complying with the Santa Cruz County Design Guidelines are encouraged to refer to these guidelines in the design of new development so that our communities continue to grow in a way that aligns with the values of the County and the existing character of the surrounding areas.

The County's biotic review process is intended to ensure protection of sensitive habitats by documenting baseline biotic conditions to guide in planning the least impactful footprint for development, and evaluating project impacts to develop measures for avoidance, minimization, and mitigation. Development plans must take into consideration the location of sensitive species and habitats, and avoidance and minimization must be demonstrated through project design. The purpose of Chapter 16.32 is to minimize the impacts of development activities on sensitive habitats. If there are reasons that would preclude avoidance and/or minimization of sensitive habitats, these reasons must be provided to the County as part of the Biotic Review with analysis and justification explaining how avoidance and minimization of impacts to sensitive resources were considered and achieved in choosing the proposed location. Compensatory mitigation for loss of sensitive resources should be considered a last resort when avoidance is not possible.

Having sensitive habitat and protected natural resources on a parcel does not mean that development cannot occur. It does mean that certain measures, such as locating building areas away from sensitive resources, retaining significant natural vegetation, restoring/preserving degraded sensitive habitat on site, and compensating for unavoidable impacts must be implemented to meet the County's requirements outlined in Santa Cruz County General Plan Policies ARC-3.1 and ARC-3.2, and Santa Cruz County Code Chapter 16.32.

The project proposes to remove all thirty-nine trees on the property including 20 coast live oaks. Five trees proposed for removal are located on adjacent properties because construction is proposed within the critical root zone of these trees. Three of these trees are small invasive non-native privet on the property to the south; two are large oak trees (Tree #437 34"dbh, and Tree #446 22"dbh) on the neighboring property to the north. The project, as currently designed, would result in permanent loss of oak woodland habitat. The exact area of permanent impact to oak woodland has not been provided as part of this biotic review. Environmental Planning Staff has estimated that approximately 0.2 acres of oak woodland habitat will be permanently impacted as a result of the project. Conditions have been included below to ensure that these impacts are included in the final impact analysis for the project and adequately compensated for pursuant to Santa Cruz County Code Section16.32.090 (B)(1).

Conclusion

There are sensitive habitat constraints on the project site that must be considered prior to and during project implementation. Conditions have been included below to protect sensitive habitats and special-status species during project construction and ensure that any unavoidable impacts are appropriately compensated for.

A copy of this biotic approval, including attachments, must be submitted with any future permit applications.

If you have any questions regarding this letter, please feel free to contact me via email at Juliette.Robinson@santacruzcounty.us.

Sincerely,

Juliette Robinson
Resource Planner IV, Biologist

CC: Leah MacCarter, Area Resource Planner
Jonathan DiSalvo, Project Planner

Conditions of Approval

The Conditions of Approval below must be incorporated into any development permits issued for parcel 025-013-37 and shall be incorporated into all phases of development for any future projects proposed on this parcel. Adherence to these conditions will ensure that proposed development is consistent with County policies that require minimization of impacts to sensitive habitats and adequate compensation for unavoidable permanent impacts to sensitive habitats.

Final approvals will occur during Environmental Planning review of permit application. Environmental Planning Staff will review the proposed project to ensure consistency with the Conditions below. A copy of this letter, including all attachments, must be submitted with any future permit applications.

General Conditions

I. A copy of this letter, including all attachments, shall be submitted with any future permit applications.

II. To reduce potential impacts to sensitive habitats and special-status species that may result from artificial light, the following shall be adhered to:

   A. The project shall avoid the installation of any non-essential artificial lighting.

   B. All essential outdoor lighting shall be limited through the use of timers and/or motion sensors.

   C. All essential outdoor lighting shall be shielded, cast downward, and directed such that it does not shine off the property into surrounding areas, other parcels, or the night sky.

III. Existing mature oak trees on the property and adjacent properties shall be incorporated into the project design to the maximum extent feasible. Trees to be retained shall be protected at or outside of the dripline. If work must occur within the dripline of retained trees, impacts shall be evaluated by a certified arborist and protective measures, as recommended by the arborist, shall be included in the project plans.

IV. To comply with Santa Cruz County General Plan Policy ARC-3.1.6 and Santa Cruz County Code Sections 16.32.090 (B)(1), to compensate for permanent impacts to sensitive oak woodland habitat, oak trees removed or otherwise permanently impacted as a result of the project shall be compensated for through in-kind replacement plantings at a 3:1 ratio through one of the options listed below.

   A. Replacement plantings: Native trees removed for this project shall be compensated for through replacement plantings in kind either onsite or at an approved offsite location at a 3:1 ratio.

      1. This option requires: a planting plan with the species, size, and locations of all replacement plantings, information regarding the methods of irrigation for all replacement plantings, a 5-year plan for maintenance and monitoring of replacement plantings.

   B. Payment to County in-leu fee program: Native trees removed for this project shall be compensated for through payment into a County approved in-leu fee program for tree removal compensation at a 3:1 ratio if/when such a program is available. This option must be considered only as a last resort and must be approved by the Environmental Coordinator. Alternative options considered and determined infeasible must be discussed in the Habitat Mitigation Plan.

   C. Offsite habitat preservation: Native trees removed for this project shall be compensated for through preservation of habitat at an offsite location approved in collaboration with the County Environmental Coordinator which includes protection in perpetuity of trees in an amount equivalent to or greater than a 3:1 ratio.

1. This option requires: a habitat evaluation and/or arborist report of the property to be preserved with the species, size, and locations of trees intended to compensate for tree removals at a 3:1 ratio, and a conservation easement or equivalent intended to protect the property as "protected habitat" from habitat disturbance in perpetuity.

D. For any off-site locations, written property owner approval for a deed restricted habitat protection site must be provided. An agreement for ongoing access to monitor and maintain the plantings for the required monitoring period must also be included.

V. A Habitat Mitigation Plan prepared by a qualified biologist or restoration specialist must be submitted with the building permit application for review and approval by Environmental Planning Staff. The plan should be focused on identifying and outlining the strategy for complying with Condition IV above and must include the following minimum elements:

A. A table with the final post-construction permanent and temporary impact calculations, area of oak woodland permanently removed as part of the project, and final quantity of oak trees removed or otherwise permanently impacted as a result of the project.

B. A map of all designated restoration areas on site or at an off-site location required for replacement oak tree plantings including a map of all designated restoration areas on that site and a planting plan with species, size, and locations of all restoration plantings including replacement oak trees required under Condition IV above.

C. Property owner approval for a deed restricted habitat protection site must be provided for any off-site locations. An agreement for ongoing access to monitor and maintain the plantings for the required monitoring period must also be included.

D. Information regarding the methods of irrigation for restoration plantings.

E. A 5-year Management Plan for maintenance and monitoring of restored areas, including a proposed mechanism for evaluating success.

F. The establishment and planting of all areas as outlined in this Plan must be completed prior to final inspection of the project.

<u>Design Conditions</u>

VI. The final plans shall include the following:

A. A plan sheet showing the development footprint delineated with a **thick bold line.** The development footprint (total project impact area) encompasses the building envelope (permanent impact area; structures and paving) and all temporary disturbance associated with a project including grading, installation of utilities, access routes, deposition of refuse or debris and areas needed for creation and management of defensible space. The development footprint shall mark the limits of work within which all temporary and permanent disturbance associated with the project may occur. This plan sheet shall also include the following:

1. All trees proposed for removal shall be shown on the plans and all oak trees shall be labeled as 'oak'.
2. Native trees to be retained near or within the project impact area shall be identified on the plans and labeled for protection.
3. Tree protection specifications and measures provided by a certified arborist to reduce impacts to retained trees shall be listed.

4. A table with the final post-construction permanent and temporary impact calculations, area of oak woodland permanently removed as part of the project, and final quantity of oak trees removed or otherwise permanently impacted as a result of the project.
5. Everything outside of the development footprint shall be marked on the plans for avoidance during construction and fenced or flagged as outlined in the construction conditions below.

Construction Conditions

VII. Trees to be retained on site or on adjacent parcels shall be protected with high visibility fencing as recommended by a certified arborist and avoided during construction. All additional protection measures provided by the arborist shall be adhered to.

VIII. To avoid impacts to protected wildlife:

A. Tree removal and building demolition shall occur during the period of September 1st through January 31st if feasible in order to avoid the bird and bat nesting season and after bumblebee colonies have senesced on their own. If building demolition and removal of vegetation begins outside of the February 1 to August 31 breeding season, there will be no need to conduct a preconstruction survey for bumblebees or active bird nests.

B. If building demolition and removal of vegetation is to commence between February 1st and August 31st the following shall be adhered to:

1. Within two weeks prior to commencement of building demolition of removal of trees, a survey for active bird nests shall be conducted by a qualified biologist. The survey area shall include the project area, and a survey radius around the project area of 50 feet for MBTA birds and 250 feet for birds of prey.

    a. If no active nest of a bird of prey or MBTA bird is found, then no further avoidance and minimization measures are necessary.

    b. If active nest(s) of MBTA birds or birds of prey are found in the survey area, an avoidance buffer intended to prevent project-related nest abandonment shall be established around the active nest(s). The size of the buffer shall be determined by the biologist as appropriate to the species and types of work activities being completed. The biologist shall monitor the nest to ensure that nesting behavior is not negatively impacted and will advise the applicant when all young have fledged the nest. The project biologist shall have the authority to increase the buffer distance based on monitoring results if necessary to provide adequate protection for nesting birds. Removal of vegetation, grading activity, or other use of heavy equipment may begin after fledging is complete.

    c. If removal of vegetation, grading activity, or other use of heavy equipment stops for more than two weeks during the nesting season (February 1st - August 31st) a new survey shall be conducted prior to re-commencement of construction.

2. A survey to confirm presence/absence of bumblebee activity shall be conducted by a qualified biologist within two weeks prior to building demolition or removal of trees. If bumblebee activity indicating a potential nest site is observed, development activity that would disturb the nest, may not occur until bumblebee activity has ceased. Once bumblebee activity (bees entering and exiting the location) has ceased, development activity may proceed.

C. To avoid impacts to bats: Within two weeks prior to building demolition or removal of trees, a focused survey for bats shall be conducted by a qualified biologist. If no bats are occupying the outbuildings or tree cavities, then demolition or removal of trees may proceed. If bats are observed using the outbuildings or tree cavities, then the biologist, in coordination with CDFW, will recommend methods to either allow bats to leave the outbuildings and trees and not return (exclusion devices), or other methods specific to this demolition project to avoid harm to individual bats. Trees without cavities may have foliage roosting bats occasionally. To avoid harm to individual bats, trees shall be cut down and allowed to lie on the ground for 24 hours prior to chipping, to allow any foliage roosting bats to leave on their own.

D. To avoid impacts to San Francisco dusky-footed Woodrats: Within two weeks prior to commencement of construction, a qualified biologist shall perform a pre-construction survey for woodrat houses within the work area boundaries and a 25-foot buffer around the proposed work. Flag and establish buffers around each woodrat house observed. The buffer width will be determined by the qualified biologist, but will not be less than 5 feet. If a woodrat house is present and impacts cannot be avoided, then a qualified biologist shall contact CDFW for approval to implement a woodrat relocation plan. This could involve live trapping and the construction of alternate houses in adjacent suitable habitat. The woodrat relocation plan must be implemented by a qualified biologist possessing a Scientific Collection Permit authorizing the handling of woodrats. Authorization by CDFW must be obtained prior to the implementation of this measure. Post-relocation monitoring may be required by CDFW, as part of the plan.

IX. A brief memo summarizing the results of the preconstruction surveys outlined above shall be submitted to the Environmental Coordinator for review prior to the start of construction.

9/11/2025
Version 3

Clay Toombs
Workbench
189 Walnut Ave
Santa Cruz, CA 95060
323-363-0257
Clay@workbenchbuilt.com

Re: Tree report for proposed site development at 3500 Paul Sweet Rd, Santa Cruz, CA 95065

Dear Clay,

At your request, we have visited the property referenced above to evaluate the trees present with respect to the proposed project. This report contains our analysis.

Summary

Seventy trees are present on and adjacent to this property. Thirty-nine trees are recommended for removal, as they conflict with project features. Of these trees, one tree would be recommended for removal regardless of construction because it is dead, and another because it is a stump resprout, and finally, since four trees have exposed roots on the street side, they would also be recommended for removal regardless of construction.

All other trees are in reasonably good condition and should be preserved as detailed in the Recommendations below. With proper protection, all trees are expected to survive and thrive during and after construction, depending on their existing condition.

Assignment and Limits of Report

We have been asked to write a report detailing impacts on trees from the proposed site development on this property. This report may be used by our client and others involved in the project as needed to inform all stages of the project.

All observations were made from the ground with basic hand tools. A corresponding tag was placed on all trees in which access was granted. None of the trees at the adjacent retirement home property were tagged. No root collar excavations or aerial inspections were performed. No project features had been staked at the time of our site visit.

Observations

Trees

There are 70 trees on and adjacent to this property. Thirty-one are coast live oaks (Quercus agrifolia), ten are coast redwoods (Sequoia sempervirens), four are silver wattles (Acacia dealbata), and the remaining 16 are of various other species.

Protected statuses - for this project, all trees 6 inches DBH and above were collected as Significant Trees. Trees #401-406, 408-415, 418-423, 426, 433-446 overhang the property from adjacent properties. Trees #448-459 and 462-470 are located on the parcel being incorporated into the project by the Lot Line Adjustment. Trees # 418, 426, 429, 453, 458, 460, and 461 are not protected, but have been included in this inventory to accommodate Code Section 13.11.070.

Health - most trees present are in moderate to good health. Only tree #450 is in poor health.

Structure - most trees present exhibit good to moderate branching structure. Only trees #403, 462, 463, 464, 466, 467, 468, and 469 exhibit poor structural integrity.

Form - is tree shape as relating to aesthetics, maintenance issues, conflicts with nearby objects, and so on. Trees #403, 462, 463, 464, 466, 467, 468, and 469 are the only trees with poor form.

Dead trees and other concerns - tree #411 is dead. It appears that it was a coast live oak, but the health, structure, and form are all rated at zero. Tree #470 is a stump resprout of a

coast live oak that broke off at about five feet. Trees #462-465 all have exposed roots on the street side, well within their CRZs, and the long-term stability of these trees is a concern. While these trees are more likely to hinge fail onto the lot, this poses a risk to any onsite structures, and the trees have a moderate to high likelihood to roll or slide into the street if they fail.

Current Site Conditions

A single-family home and associated structures are currently present on the property. The driveway is unpaved, but graded, and no hardscape is present. Overhead utilities are present at the front of the property, and a chain link property line fence is present at the rear (east) of the site between the property and the neighboring driveway.

GRADE - The property appears to be mostly level, but has a moderate slope from east to west. Sections of the property are uneven (soil mounds, mulch, and debris on site).

BUILDINGS - one single-family home stands in the center of the property. Two sheds are present near or in the utility easement. All structures are in a state of disrepair.

HARDSCAPE - No hardscape is present on the property.

FENCES - A chain link property line fence is present at the rear (east) of the site between the property and the neighboring driveway. At some point, the property was staked to delineate the property lines, but this has since been destroyed by the elements. The property lines are not intuitive, and currently, the survey must be referenced to determine the site bounds.

UTILITIES - Overhead utilities are present at the front (west) of the site. No water, gas, or other utilities were easily apparent onsite or via curb stamp at the time of inspection.

LANDSCAPING - The site remains largely unlandscaped, with a few ornamental plants and fruit trees. Sections of the site are dense with poison oak, which is often interspersed with berry vines. No irrigation appears to be present, so all ornamentals are in a state of decline.

OTHER NOTABLE FEATURES - animal scat, likely deer, was found onsite, as well as turkey feathers. While onsite, Aesculus observed a turkey.

Project Features

DEMOLITION - The single-family home and two sheds will be demolished for upcoming construction. No onsite structures will be retained.

STAGING - staging areas were not observed on the plans, but it is currently assumed that staging will occur off-site. Staging must be mindful of all trees to be retained and keep heavy equipment out of their TPZs.

GRADING - Excavation will be taking place for an underground parking garage, so heavy grading and excavation will be necessary to construct the project. The project will have driveways and parking areas beyond the area of excavation, so grading will need to take place on the entire extent of the site.

BUILDINGS - A multi-family residence building will be constructed on this site.

HARDSCAPE - The site will have new paved walkways and a paved driveway approach.

LANDSCAPING - due to the extent of the construction, landscaping will need to be minimal, and will be constrained to planters and designated planting areas.

Potential Conflicts

Planned construction overlaps the trunks of most of the trees proposed for removal, including #407, 416, 417, 424, 425, 427-432, and 447-468. The TPZ[1] and the CRZ[2] of trees #410-412, 437, and 446, hence why these trees are proposed for removal[3].

Trees # 401-406, 408, 409, 413-415, 418-423, 426, 433-436, 438-445, and 469 - all proposed project features and logical access routes thereto are outside these trees' TPZs[4] or have minimal, acceptable impacts.

[1] Tree protection zones. See Discussion, Tree Map, and Tree Table for more detail.
[2] Critical root zone. See Discussion, Tree Map, and Tree Table for definition and significance
[3] The TPZ and CRZ of trees under 6 inches has not been evaluated, since these are not protected by the Code.
[4] Tree protection zones. See Discussion, Tree Map, and Tree Table for more detail.

Testing and Analysis

Tree DBHs[5] were taken using a diameter tape measure if trunks were accessible. Multistemmed trees were measured below the point where the leaders diverge, if possible. The DBHs of trees with non-accessible trunks were estimated visually. All trees over four inches in DBH were inventoried, as well as street trees of all sizes. Vigor ratings are based on tree appearance and our experiential knowledge of each species' healthy appearance.

Tree location data were collected using a GPS smartphone application and processed in Quantum GIS (QGIS) to create the maps included in this report. Due to the error inherent in GPS data collection, and due also to differences between GPS data and CAD drawings, tree locations and all dimensions shown on the Tree Map are approximate. The percentages of TPZs impacted by project features were calculated in QGIS but should be considered approximate due to potential errors in tree locations or feature locations.

Data were collected by Elizabeth Lanham, ISA Certified Arborist #WE-9234A and Katherine Naegele, ISA Certified Arborist #WE-9658A with basic hand tools (such as, but not limited to: hand hoe; hatchet; rubber mallet; measuring tape; etc.) at one site visit on June 30, 2025. All observations and photographs in this report were taken at that/those site visit(s).

The tree protection analysis in this report is based on the following document(s), provided to us electronically by the project team:

- Proposed site plan: Site Plan; 1-30-2025
- Grading plan: Preliminary Grading and Drainage Plan; 5-17-2024

We also had the opportunity to review a previously prepared Tree Protection Report, but due to discrepancies in methodology (Aesculus uses BMP standards, and this report was done in the Coder method) and incomplete County documents research, the previous report is not referenced in this report.

[5] diameter at breast height (4.5 feet above grade), a standard arboricultural measurement

Discussion

Tree Protection Zones (TPZs)

Tree roots grow where conditions are favorable, and their spatial arrangement is, therefore, unpredictable. Favorable conditions vary among species, but generally include the presence of moisture and soft soil texture with low compaction.

Contrary to popular belief, roots of all tree species grow primarily in the top two to three feet or less of soil in the clay soils typical for this geographic region, with roots occasionally occurring at greater depths when soil conditions allow. Some species have taproots when young, but these almost universally disappear with age. At maturity, a tree's root system may extend out from the trunk farther than the tree is tall, and the tree maintains its upright position in much the same manner as a wine glass.

The optimal area around a tree that should be protected from disturbance depends on the tree's trunk diameter, species, and vigor, as shown in the following table (adapted from *Trees & Construction*, Matheny and Clark, 1998):

Species tolerance	Tree vitality[6]	Distance from trunk (feet per inch trunk diameter)
Good	High	0.5
	Moderate	0.75
	Low	1
Moderate	High	0.75
	Moderate	1
	Low	1.25
Poor	High	1
	Moderate	1.25
	Low	1.5

It is important to note that some roots will almost certainly be present outside the TPZ; however, root loss outside the TPZ is unlikely to cause tree decline.

[6] Matheny & Clark uses tree age, but we feel a tree's vitality more accurately reflects its ability to handle stress.

Critical Root Zones (CRZs)

Although root loss inside the tree protection zone (TPZ) may cause a short-term decline in tree condition, trees can often recover adequately from limited disturbance in this area.

Tree stability is impacted at a shorter distance from the tree trunk. For linear cuts on one side of the tree, the minimum distance typically recommended is three times the DBH, measured from the edge of the trunk (Best Management Practices: Root Management, Costello, Watson, and Smiley, 2017). This is called the critical root zone, as substantial root loss closer than this increases a tree's likelihood of failure.

Note that trees sometimes have asymmetrical root systems, and if no substantial roots are present in a given area, impacts on the tree will be minimal to minor regardless of distance from the trunk.

Oak Woodlands and Sensitive Habitat

According to the United States Department of Agriculture (USDA) Forest Service, oak woodlands are a type of forest cover[7] and the minimum area for classification of forest land is 1 acre (0.4 ha) in size and 120 feet (36.6 m) wide measured stem-to-stem from the outer-most edge[8]. The parcel in question is approximately 0.4 acres (0.16 ha) of contiguous oak lands, thus disqualifying it as oak woodland/forest land. These parcels are both classified as part of the Urban Services Line, and the County GIS does not designate the parcels as Sensitive Habitat.

Paclobutrazol

Applying the growth-regulating chemical paclobutrazol can substantially improve a tree's ability to deal with stress of any kind. It causes woody plants to produce short twigs, miniaturized leaves, and increased fine root mass, thereby both reducing water loss through the canopy and enhancing the tree's ability to take up water from the soil.

[7] Kerry Dooley. Woodlands. 2017. Forest Resources of the United States. Available at https://www.srs.fs.usda.gov/pubs/chap/chap_2019_dooley.pdf

[8] USDA Forest Service, Research and Development. Forest Definitions Applied in Reporting. Last updated August 29, 2024. Available at https://research.fs.usda.gov/programs/fia/forestdefinitions.

Root Damage

Tree roots serve three primary functions: uptake of water and nutrients; storage of carbohydrates; and structural support. When roots are removed or damaged, one or more of these functions are impacted, with the severity depending on the amount and/or location of damage. Possible consequences include tree decline, death, or failure (falling down). Mature trees may decline slowly over the course of several years or even decades.

Conclusions[9]

Trees #401-406, 408, 409, 413-415, 418-423, 426, 433-436, 438-445, and 469 - **minimal** impacts on these trees are likely from the project as proposed.

Trees #407, 410-412, 416, 417, 424, 425, 427-432, 437, 446-468, and 470 will be removed for the construction project.

Recommendations[10][11]

Preconstruction Phase

1. Remove trees # 407, 410-412, 416, 417, 424, 425, 427-432, 437, 446-468, and 470.
2. Consult with the Project Arborist regarding designated locations for the following activities, and any others that may affect tree protection zones (including, but not limited to, seepage and exhaust):
    a. Equipment storage
    b. Materials storage
    c. Portable toilets
    d. Clean-out areas for paint, concrete, etc.
    e. Sump pump outlet
3. Growth regulator - apply paclobutrazol to trees # 401-406, 408, 409, 413-415, 418-423, 426, 433-436, 438-445, and 469.

[9] All conclusions assume the tree protection measures recommended in this report. Without proper tree protection measures, any tree could be damaged.
[10] All recommendations are driven by the requirements of the jurisdiction in which the property is located, and by industry best practices.
[11] Bolded items are emphasized only because in my experience they are tend to be overlooked.

    a. All chemical applications shall be made according to labeled rates by a qualified professional with the appropriate certifications under the direction of a Certified Arborist.
        i. Consult with the arborist overseeing the application about recommendations for future paclobutrazol applications, if any.
4. Trunk wraps - install as described below for any trees that cannot be protected by the proposed fencing measures:
    a. Place straw wattle around the trunk to a height of at least 6 feet.
    b. Wrap wattle with orange snow fencing or other similar high-visibility material.
    c. Every 6 months, remove used wattle and replace with fresh wattle.
        i. Allow 72 hours after removal of used wattle before installing fresh wattle, to allow airflow to the trunk.
5. Tree protection fencing - install as shown in the Tree Map.
    a. Minimum fencing distances are shown on the Tree Map, plus some small areas outside TPZs if needed for practicality. Fencing must be installed at or beyond these distances. **Note that the TPZs of some offsite trees may extend onto this property and require fencing.**
        i. Please be aware that tree protection fencing may differ from ideal tree protection zones, and from canopy sizes.
    b. Where existing barriers which will be retained impede access comparably to tree protection fencing, these barriers are an acceptable substitute for tree protection fencing. These barriers must display the required signage as described in d, below.
    c. Tree protection fencing shall comprise 6’ chain link fabric mounted on 8’ tall 1.5” diameter metal posts driven into the ground and spaced no more than 10 feet apart.
    d. Tree protection fencing shall be posted with signs saying “TREE PROTECTION FENCE - DO NOT MOVE OR REMOVE WITHOUT APPROVAL FROM COUNTY ARBORIST.”
    e. Place a 6” layer of wood chips inside tree protection fencing.
6. Compaction mitigation - although the areas outside TPZs appears sufficient to accommodate construction access, it is permissible to install compaction mitigation within TPZs if needed, per the following specifications:
    a. Spread wood chips to a depth of 4-6”.

b. Top with ¾"-thick plywood or other durable material secured to the ground with long bolts, capped rebar, or another appropriate fastener to prevent shifting.[12]
c. Ensure that the remainder of the area designated for tree protection fencing is fully enclosed.
d. It is permissible to install compaction mitigation elsewhere within TPZs if needed, as long as the remainder of each tree's TPZ is fenced.

7. Canopy Pruning - while no canopy pruning was identified at the time of inspection, if it needs to take place, it must adhere to the following guidelines:
    a. Notify the Project Arborist before any pruning takes place.
    b. All pruning must be performed by a tree care company with a valid California Contractor License, under the direction of an ISA-Certified Arborist on staff at that company (not necessarily the Project Arborist).
        i. The arborist directing the pruning does not need to remain onsite for the entire duration of pruning.
        ii. We recommend a pre-job meeting between the Project Arborist and the arborist overseeing the pruning.[13]
    c. After pruning is complete, submit photographs to the Project Arborist. The Project Arborist may elect to visit the site to verify pruning outcomes.
8. **Tree Protection Verification Letter** - notify the Project Arborist when tree protection measures are in place. The Project Arborist will inspect the tree protection measures to verify their presence and condition, and will issue a letter to the city with their findings.

Demolition Phase

1. Maintain tree protection measures as detailed above.
2. When demolishing existing features within TPZs, start work close to trees and move backwards, limiting equipment to still-paved areas. This applies to any demo within TPZs, whether listed or not.

Construction Phase

1. Maintain tree protection measures as detailed above.

[12] One effective method we have observed for securing plywood is to place rebar just outside the edges and top with square caps.
[13] Not required by the jurisdiction

2. **Monthly Monitoring Reports** - inform the Project Arborist when construction is set to begin. The Project Arborist shall visit the site once per month thereafter to verify that all tree protection measures are maintained in working condition, and shall issue a letter to the city with their findings.
3. Alert the project arborist if utility or other work not anticipated in this report becomes necessary within any tree TPZs.
4. If live roots over 1" in diameter are encountered when excavating in any location:
    a. Excavate with pneumatic air or by hand to the full depth of the feature being installed or to a depth of three feet, whichever is shallower.
        i. If all roots must be removed, e.g., for a building foundation, then excavate only the edge nearest the tree with pneumatic air or by hand. After roots have been severed (see below for pruning specifications), the remaining excavation may be done with heavy machinery.
    b. Retain as many roots as practical. Route conduit and other features around and between roots insofar as practical.
    c. If roots 1-2" in diameter must be cut, sever them cleanly with a sharp saw or bypass pruners.
    d. If roots over 2" must be cut, stop work in that area and contact the project arborist for guidance.
    e. If excavation will be left open for more than 3 days:
        i. Cover excavation wall nearest trunk with several layers of burlap or other absorbent fabric.
        ii. Install a timer and soaker hoses to irrigate with potable water twice per day, enough to wet fabric thoroughly.
5. Notify Project Arborist when excavation is complete. Project arborist shall inspect work to make sure all roots have been cut cleanly.
    a. The Project Arborist shall provide a follow-up letter documenting that the excavation was performed to specification.
6. **Final Monitoring Report** - inform the Project Arborist when construction is set to end. The Project Arborist will make one final site visit to document the trees' condition, and will issue any final mitigation recommendations if needed.
    a. The Final Report may be completed by city staff instead at staff's discretion, pending staff availability.

Post-Construction Phase

1. Install new trees to offset the removal of trees # 407, 410-412, 416, 417, 424, 425, 427-432, 437, 446-468, and 470 where possible
    a. Note: the Oakwood Memorial Park and Cemetery has requested that trees be planted along the park strip in front of their parcel to help obstruct the view of the new structure for cemetery visitors. The street area along Paul Sweet (east cemetery property line), across from the planned construction, is approximately 300 feet long, with only a few trees currently located in the park strip. The majority of the park strip is obstructed by overhead wires, so species planted should be slow-growing or utility-friendly.
    b. Recommended species include California Buckeye (*Aesculus californica*), Leather Oak (*Quercus durata*), Pinyon Pine (*Pinus edulis*), Western Redbud (*Cercis occidentalis*), and Toyon (*Heteromeles arbutifolia*) if California native species are desired.
    c. The above species should be planted at 15-25 ft on-center spacing, depending on their mature canopy spread, providing an estimated 15 planting spaces. If additional planting locations are desired, additional plantings can be considered at the north and south property lines.
2. **Final Arborist Inspection** - inform both the Project Arborist and the City Arborist when exterior construction is set to end. The City Arborist shall visit the site, after replacement trees have been planted (if applicable), but before tree protection fencing has been removed.
3. Remove tree protection measures, upon approval from the Project Arborist and City Arborist.
4. Provide supplemental irrigation for trees #418-423 and 426 to aid in root regrowth for at least two years.
    a. Irrigate at a very slow trickle for several hours to ensure infiltration. Once per month is usually sufficient.
    b. COAST LIVE OAKS/DEODAR CEDARS Irrigation should only take place in the normal rainy season for this area (October - April), and only if rainfall is below average.
    c. All other species should be irrigated year-round.
    d. Irrigation should be paused during the rainy season if rainfall is average or above.

Additional Materials Submitted as Separate Documents

1. 3500 Paul Sweet Tree Map
2. 3500 Paul Sweet Tree Photographs
3. 3500 Paul Sweet Tree Table

Respectfully submitted,

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Terms of Assignment

The following terms and conditions apply to all oral and written reports and correspondence pertaining to the consultations, inspections, and activities of Aesculus Arboricultural Consulting:

1. All property lines and ownership of property, trees, and landscape plants and fixtures are assumed to be accurate and reliable as presented and described to the consultant, either orally or in writing. The consultant assumes no responsibility for verification of ownership or locations of property lines, or for results of any actions or recommendations based on inaccurate information.
2. It is assumed that any property referred to in any report or in conjunction with any services performed by Aesculus Arboricultural Consulting is in accordance with any applicable codes, ordinances, statutes, or other governmental regulations, and that any titles and ownership to any property are assumed to be good and marketable. The existence of liens or encumbrances has not been determined, and any and all property is appraised and/or assessed as though free and clear, under responsible ownership and competent management.
3. All reports and other correspondence are confidential and are the property of Aesculus Arboricultural Consulting and its named clients and their assigns or agents. Possession of this report or a copy thereof does not imply any right of publication or use for any purpose, without the express permission of the consultant and the client to whom the report was issued. Loss, removal, or alteration of any part of a report invalidates the entire appraisal/evaluation.
4. The scope of any report or other correspondence is limited to the trees and conditions specifically mentioned in those reports and correspondence. Aesculus Arboricultural Consulting assumes no liability for the failure of trees or parts of trees, inspected or otherwise. The consultant assumes no responsibility to report on the condition of any tree or landscape feature not specifically requested by the named client.
5. All inspections are limited to visual examination of accessible parts, without dissection, excavation, probing, boring or other invasive procedures, unless otherwise noted in the report, and reflect the condition of those items and features at the time of inspection. No warranty or guarantee is made, expressed or implied, that problems or deficiencies of the plants or the property will not occur in the future, from any cause. The consultant shall not be responsible for damages caused by any tree defects, and assumes no responsibility for the correction of defects or tree related problems.
6. The consultant shall not be required to provide further documentation, give testimony, be deposed, or to attend court by reason of this appraisal/report unless subsequent contractual arrangements are made, including payment of additional fees for such services as set forth by the consultant or in the fee schedule or contract.
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NOTES

1. FINAL PLANS SHALL BE IN COMPLIANCE WITH 2022 C.F.C., 2022 C.B.C. AND OTHER APPLICABLE AMENDMENTS.
2. FIRE PLANS FOR PROTECTION OF NEW AND EXISTING BUILDINGS SHALL BE SUBMITTED PRIOR TO CONSTRUCTION OF BUILDING.
3. PROPOSED BUILDING SHALL BE PROTECTED BY AN APPROVED AUTOMATIC SPRINKLER SYSTEM COMPLYING WITH SECTION 903 OF NFPA 13 CURRENTLY ADOPTED IN CHAPTER 35 OF THE CALIFORNIA BUILDING CODE.
4. ORDINANCES, STANDARDS AND REGULATIONS SHALL BE THE MINIMUM REQUIREMENTS OF THE COUNTY OF SANTA CRUZ AND THE CENTRAL FIRE DISTRICT ORDINANCES/STANDARDS.
5. ALL EXISTING SEPTIC SYSTEMS AND/OR SEWER LATERALS SERVING STRUCTURES TO BE DEMOLISHED SHALL BE BY-PASSED AND ABANDONED PER SCCDEH 19-18. APPLICANT SHALL REQUEST A SEPARATE SEWER LATERAL ABANDONMENT PERMIT.
6. DESTINATION UNITS (SCM-1a - SCM-1d & OCS) SHALL BE 1, 2, OR 4.
7. DRY SYSTEMS TO BE DESIGNED BY OTHERS. TRANSITION JOINTS IN SPOOLS SHOWN FOR COORDINATION PURPOSES.
8. EXISTING POST UTILITY CONNECTIONS - GAS & TELCO ABANDONED IN COORDINATION WITH PG&E.
9. EXISTING WATER SERVICE TO REMAIN AND BY-PASSED DURING PROJECT IRRIGATION SERVICE. JACK & BORE TO BE ADDED SEWER SIDE.
10. COVERED PARKING AND TRASH ENCLOSURE SHALL HAVE NO FLOOR DRAINS WHICH ARE NOT CONNECTED TO SANITARY SEWER SYSTEM.
11. APPROXIMATE DOMESTIC WATER FIXTURE UNIT (D.F.U.) ANTICIPATED: 6" WATER SERVICE, RATED FOR 700 FIXTURE UNITS, PER UPC METER SIZING CHART.

FIRE HYDRANT DATA

FLOW DATA PROVIDED BY THE CITY OF SANTA CRUZ WATER DEPARTMENT, DATED 05/11/2023

HYDRANT #	HYDRANT TYPE	STATIC PRESSURE (PSI)	RESIDUAL PRESSURE (PSI)	FLOW (GPM)	FLOW @ 20PSI (GPM)
1918	6" DOUBLE	62	56	1061	2606
1936	6" STEAMER	72	58	636	1704

PROJECT FOR FLOW IS 1,000 GPM OR 120 PSI FOR TYPE A CONSTRUCTION AND 1,500 GPM OR 150 PSI FOR TYPE 1A CONSTRUCTION. PROJECTS WITH AN NFPA 13 FIRE SPRINKLER SYSTEM SHALL SUBTRACT 250 GPM FROM FLOW CALCULATIONS AND ADDITIONAL INFORMATION.

EX. 8"SS & 6" FW LATERALS TO BE REMOVED AT MAIN, CAP AND ABANDON IN PLACE, APPROX. 200 NORTH OF PROJECT PARCEL

EX PRIVATE FH AT END OF DOMINICAN OAKS PARKING LOT ALONG PAUL SWEET RD, APPROX. 100 FT NORTH OF PROJECT PARCEL, HYDRANT TYPE AND FLOW RATE NOT DOCUMENTED

APN 025-013-34

APN 025-011-04

PAUL SWEET ROAD

EX 10" WATER MAIN

PODIUM BUILDING

APN 025-013-38

TRANSFORMER, BY OTHERS

OCS-1a 18x18
RIM 116.00
INV PERF 111.75
INV OVERFLOW 112.75
INV SD 107.85

6" FIRE SERVICE CONNECTION, COMPACT BACKFLOW & ASSEMBLY (NOTE 11)

OCS-1b 18x18
RIM 117.50
INV PERF 115.25
INV OVERFLOW 116.25
INV SD 107.50

EX. CI
RIM 113.90
INV 106.24
NEW INV 107.25

3" DOM. SERVICE CONNECTION (NOTE 10)

FIRE HYDRANT (NOTE 2)

IRR. WATER SERV. & BFP, (NOTE 8)

CONTINUATION OF IRRIGATION SYSTEM PER LANDSCAPE PLANS (BY OTHERS)

TD
RIM 116.60
INV 116.20

TD
RIM 117.42
INV OUT 116.10

OVERFLOW
RIM 119.50
INV 116.50

CO(S)
INV 115.25 (TYP)

SCM-1b
TW 120.25
TBS 119.00
TDR 117.00
INV PERF 115.25
BRB 115.00
PERF 1.25"ø x158LF

OVERFLOW
RIM 119.50
INV 116.50

CURB CUT

CO
INV 115.25

CURB CUT

SCM-1c
TW 120.25
TBS 119.00
TDR 117.00
INV PERF 115.25
BRB 115.00
PERF 1.25"ø x72LF

CO(S)
INV 115.25 (TYP)

OCS-1c 18x18
RIM 117.57
INV PERF 115.25
INV OVERFLOW 116.25
INV SD 108.66

OUTLET
INV 116.00

SCM-1d
TW 118.25
TBS 115.50
TDR 113.50
INV PERF 111.75
BDR 109.50

OCS-1d 18x18
RIM 117.94
INV PERF 111.75
INV OVERFLOW 112.75
INV SD 109.50
PERF 1.25"ø x56LF

OVERFLOW
RIM 116.00
INV 113.00

CO(S)
INV 111.75 (TYP)

OVERFLOW
RIM 116.00
INV 113.00

TD
RIM 109.90
INV 108.40

EX. SS LAT. (UNUSED, CAPPED 3' FROM MANHOLE, TO BE REMOVED)

EX. SSMH (TO BE REMOVED)
RIM 136.74
INV 127.44

EX. SS LAT. (UNUSED, TO BE REMOVED)

EX. 6" SS (ON-SITE SEGMENT TO BE REMOVED)

EX. SS LAT. (SERVES ON-SITE DWELLING SET FOR DEMOLITION, TO BE REMOVED)

6" SS OUTLET
INV 127.0±

COTG
INV TO MATCH EX. 6"SS (APPOX 126.5±)

TIE IN TO EX. 6"SS AT PROPERTY LINE

EX. 6" SS (OFF-SITE SEGMENT TO BE

SEE PLAN BELO

EX. SS LAT. (BELIEVED UNUSED, TO BE VERIFIED DURING CONSTRUCTION)

EX. SS
RIM 133.
INV 121.

EX. 8"SS
(TO PAUL SWEET S

2025-07-30

Aesculus Arboricultural Consulting

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- Tree trunks, to scale. Locations approximate where not matched to survey. Note that tree trunks may not be round in cross section.
- Critical root zones (minimal disturbance recommended)
- Tree protection zones (ideal; may differ significantly from canopy size and from recommended tree protection measures)
- Trees proposed for removal
- Tree protection fencing

Exhibit J

P:\PROJECTS\DWGS\2 - DD PHASE_DD PHASE\C2.0-UTIL.dwg 15May25 03:12:36 PM DDraeger ©FLAND ENGINEERS, INC.

Tree # (0 total)	Common Name	Species	DBH (in.)	Health Rating (%)	Structure Rating (%)	Form Rating (%)	Suitability for Preservation (%)	Protected Tree - 63	Street Tree - 0	Off-Site Tree - 21	Protected Removals - 0	Species Construction Tolerance (1 = poor, 3 = good)	CRZ radius (ft. from center of trunk)	TPZ radius (ideal; ft. from center of trunk)	Notes
401	coast redwood	*Sequoia sempervirens*	24.0	85	80	80	83	☑	☐	☑	☐	3	7.0	12.0	-
402	coast redwood	*Sequoia sempervirens*	20.0	85	80	80	83	☑	☐	☑	☐	3	5.8	10.0	-
403	willow	*Salix sp.*	10.0	75	10	10	43	☑	☐	☑	☐	2	2.9	7.5	trunk failure just prior to our site visit
404	willow	*Salix sp.*	16.0	80	70	70	75	☑	☐	☑	☐	2	4.7	12.0	bird nest, platform type suggesting a raptor
405	coast live oak	*Quercus agrifolia*	20.0	80	65	70	73	☑	☐	☑	☐	3	5.8	10.0	-
406	white poplar	*Populus alba*	12.0	80	50	65	65	☑	☐	☑	☐	2	3.5	9.0	-
407	hawthorn	*Crataegus crus-galli*	15.3	75	65	65	70	☑	☐	☐	☐	3	4.5	7.7	multi
408	coast live oak	*Quercus agrifolia*	8.0	85	70	70	78	☑	☐	☑	☐	3	2.3	4.0	-
409	Ponderosa pine	*Pinus ponderosa*	14.0	80	75	75	78	☑	☐	☑	☐	3	4.1	7.0	-
410	privet	*Ligustrum lucidum*	10.0	70	65	65	68	☑	☐	☑	☐	3	2.9	5.0	-
411	dead	-	8.0	0	0	0	0	☑	☐	☑	☐	#N/A	-	-	looks like coast live
412	privet	*Ligustrum lucidum*	6.0	70	70	70	70	☑	☐	☑	☐	3	1.8	3.0	-

Tree # (0 total)	Common Name	Species	DBH (in.)	Health Rating (%)	Structure Rating (%)	Form Rating (%)	Suitability for Preservation (%)	Protected Tree - 63	Street Tree - 0	Off-Site Tree - 21	Protected Removals - 0	Species Construction Tolerance (1 = poor, 3 = good)	CRZ radius (ft. from center of trunk)	TPZ radius (ideal; ft. from center of trunk)	Notes
413	ponderosa pine	*Pinus ponderosa*	24.0	80	80	75	80	☑	☐	☑	☐	3	7.0	12.0	-
414	coast live oak	*Quercus agrifolia*	6.0	75	60	60	68	☑	☐	☑	☐	3	1.8	3.0	-
415	ponderosa pine	*Pinus ponderosa*	20.0	80	80	80	80	☑	☐	☑	☐	3	5.8	10.0	-
416	photinia	*Photinia sp.*	16.0	75	60	65	68	☑	☐	☐	☐	2	4.7	12.0	multi
417	coast live oak	*Quercus agrifolia*	12.3	85	60	60	73	☑	☐	☐	☐	3	3.6	6.2	-
418	coast redwood	*Sequoia sempervirens*	3.0	90	90	90	90	☐	☐	☑	☐	-	-	-	-
419	coast redwood	*Sequoia sempervirens*	8.0	90	90	90	90	☑	☐	☑	☐	3	2.3	4.0	-
420	coast redwood	*Sequoia sempervirens*	14.0	90	90	90	90	☑	☐	☑	☐	3	4.1	7.0	-
421	coast redwood	*Sequoia sempervirens*	10.0	90	90	90	90	☑	☐	☑	☐	3	2.9	5.0	-
422	coast redwood	*Sequoia sempervirens*	16.0	90	90	90	90	☑	☐	☑	☐	3	4.7	8.0	-
423	coast redwood	*Sequoia sempervirens*	8.0	90	90	90	90	☑	☐	☑	☐	3	2.3	4.0	-
424	Catalina cherry	*Prunus ilicifolia*	11.3	85	75	75	80	☑	☐	☐	☐	2	3.3	8.5	multiple stems, DBHs 9.7, 4.8, 3.3
425	quince	*Cydonia oblonga*	6.0	75	65	65	70	☑	☐	☐	☐	2	1.8	4.5	-

Tree # (0 total)	Common Name	Species	DBH (in.)	Health Rating (%)	Structure Rating (%)	Form Rating (%)	Suitability for Preservation (%)	Protected Tree - 63	Street Tree - 0	Off-Site Tree - 21	Protected Removals - 0	Species Construction Tolerance (1 = poor, 3 = good)	CRZ radius (ft. from center of trunk)	TPZ radius (ideal; ft. from center of trunk)	Notes
426	coast redwood	*Sequoia sempervirens*	3.0	90	90	90	90	☐	☐	☑	☐	-	-	-	-
427	silver wattle	*Acacia dealbata*	7.5	65	70	75	68	☑	☐	☐	☐	3	2.2	5.6	multiple stems, DBHs 6.1, 3.2,3.0
428	silver wattle	*Acacia dealbata*	9.3	75	70	75	73	☑	☐	☐	☐	3	2.7	4.6	multiple stems, DBHs 6.9, 6.2
429	coast live oak	*Quercus agrifolia*	4.0	80	75	75	78	☐	☐	☐	☐	-	-	-	-
430	silver wattle	*Acacia dealbata*	8.6	75	75	75	75	☑	☐	☐	☐	3	2.5	4.3	multiple stems, DBHs 6.7, 3.9, 3.7
431	silver wattle	*Acacia dealbata*	16.0	75	70	70	73	☑	☐	☐	☐	3	4.7	8.0	multi
432	Catalina cherry	*Prunus ilicifolia*	7.8	75	75	75	75	☑	☐	☐	☐	2	2.3	5.8	multiple stems, DBHs 7.3, 2.2, 1.6
433	coast live oak	*Quercus agrifolia*	7.2	80	75	80	78	☑	☐	☐	☐	3	2.1	3.6	-
434	coast live oak	*Quercus agrifolia*	16.3	80	70	75	75	☑	☐	☐	☐	3	4.8	8.2	-
435	coast live oak	*Quercus agrifolia*	16.0	85	70	70	78	☑	☐	☐	☐	3	4.7	8.0	multiple stems, DBHs 15.5, 4.0
436	coast live oak	*Quercus agrifolia*	12.1	85	55	70	70	☑	☐	☐	☐	3	3.5	6.1	poor juncture, horseshoes embedded in branches

Tree # (0 total)	Common Name	Species	DBH (in.)	Health Rating (%)	Structure Rating (%)	Form Rating (%)	Suitability for Preservation (%)	Protected Tree - 63	Street Tree - 0	Off-Site Tree - 21	Protected Removals - 0	Species Construction Tolerance (1 = poor, 3 = good)	CRZ radius (ft. from center of trunk)	TPZ radius (ideal; ft. from center of trunk)	Notes
437	coast live oak	*Quercus agrifolia*	34.0	65	70	70	68	☑	☐	☐	☐	3	9.9	25.5	-
438	coast live oak	*Quercus agrifolia*	19.7	65	65	65	65	☑	☐	☐	☐	3	5.7	14.8	-
439	coast live oak	*Quercus agrifolia*	9.3	65	45	50	55	☑	☐	☐	☐	3	2.7	7.0	dead limb, suppressed
440	coast live oak	*Quercus agrifolia*	10.4	75	55	65	65	☑	☐	☐	☐	3	3.0	5.2	included bark at juncture
441	coast live oak	*Quercus agrifolia*	11.0	75	65	70	70	☑	☐	☐	☐	3	3.2	5.5	crossing branches from neighboring trees
442	coast live oak	*Quercus agrifolia*	8.8	80	65	65	73	☑	☐	☐	☐	3	2.6	4.4	top is suppressed
443	coast live oak	*Quercus agrifolia*	9.9	75	65	70	70	☑	☐	☐	☐	3	2.9	5.0	-
444	coast live oak	*Quercus agrifolia*	12.0	70	70	70	70	☑	☐	☐	☐	3	3.5	6.0	-
445	coast live oak	*Quercus agrifolia*	12.0	70	70	70	70	☑	☐	☐	☐	3	3.5	6.0	-
446	coast live oak	*Quercus agrifolia*	22.0	75	40	65	58	☑	☐	☐	☐	3	6.4	11.0	poor structure
447	coast redwood	*Sequoia sempervirens*	21.6	85	75	80	80	☑	☐	☐	☐	3	6.3	10.8	multiple stems, DBHs 15.3, 14.6, 4.3

Tree # (0 total)	Common Name	Species	DBH (in.)	Health Rating (%)	Structure Rating (%)	Form Rating (%)	Suitability for Preservation (%)	Protected Tree - 63	Street Tree - 0	Off-Site Tree - 21	Protected Removals - 0	Species Construction Tolerance (1 = poor, 3 = good)	CRZ radius (ft. from center of trunk)	TPZ radius (ideal; ft. from center of trunk)	Notes
448	coast live oak	*Quercus agrifolia*	14.6	70	65	75	68	☑	☐	☐	☐	3	4.3	7.3	-
449	coast live oak	*Quercus agrifolia*	14.1	70	65	70	68	☑	☐	☐	☐	3	4.1	7.0	multiple stems, DBHs 10.0, 9.9
450	coast live oak	*Quercus agrifolia*	10.0	35	55	65	45	☑	☐	☐	☐	3	2.9	7.5	significant dieback
451	coast live oak	*Quercus agrifolia*	18.0	65	65	65	65	☑	☐	☐	☐	3	5.3	13.5	high voltage
452	coast live oak	*Quercus agrifolia*	21.8	65	65	70	65	☑	☐	☐	☐	3	6.4	16.4	high voltage
453	coast live oak	*Quercus agrifolia*	5.7	75	60	55	68	☐	☐	☐	☐	-	-	-	suppressed
454	coast live oak	*Quercus agrifolia*	24.0	75	75	75	75	☑	☐	☐	☐	3	7.0	12.0	-
455	coast live oak	*Quercus agrifolia*	16.9	75	70	70	73	☑	☐	☐	☐	3	4.9	8.5	chain in upper canopy
456	coast live oak	*Quercus agrifolia*	13.1	75	70	70	73	☑	☐	☐	☐	3	3.8	6.6	suppressed
457	coast live oak	*Quercus agrifolia*	26.0	75	65	70	70	☑	☐	☐	☐	3	7.6	13.0	multiple stems, DBHs 17.8, 19.0
458	coast live oak	*Quercus agrifolia*	4.0	75	65	65	70	☐	☐	☐	☐	-	-	-	covered in poison oak

Tree # (0 total)	Common Name	Species	DBH (in.)	Health Rating (%)	Structure Rating (%)	Form Rating (%)	Suitability for Preservation (%)	Protected Tree - 63	Street Tree - 0	Off-Site Tree - 21	Protected Removals - 0	Species Construction Tolerance (1 = poor, 3 = good)	CRZ radius (ft. from center of trunk)	TPZ radius (ideal; ft. from center of trunk)	Notes
459	coast live oak	*Quercus agrifolia*	21.5	75	45	65	60	☑	☐	☐	☐	3	6.3	10.8	multiple stems, DBHs 12.6, 14.4, 9.9; propped
460	Brazilian pepper	*Schinus terebinthifolius*	4.5	75	75	75	75	☐	☐	☐	☐	-	-	-	multiple stems, DBHs 4.1, 1.9
461	Brazilian pepper	*Schinus terebinthifolius*	4.8	75	65	75	70	☐	☐	☐	☐	-	-	-	-
462	coast live oak	*Quercus agrifolia*	6.0	70	20	25	45	☑	☐	☐	☐	3	1.8	3.0	Poor structure from wire pruning
463	coast live oak	*Quercus agrifolia*	6.0	70	30	30	50	☑	☐	☐	☐	3	1.8	3.0	Poor structure from wire pruning
464	coast live oak	*Quercus agrifolia*	7.0	70	30	25	50	☑	☐	☐	☐	3	2.0	3.5	Poor structure from wire pruning
465	Monterey pine	*Pinus radiata*	25.0	50	65	65	58	☑	☐	☐	☐	2	7.3	25.0	Poor pruning, large split outs
466	coast live oak	*Quercus agrifolia*	10.0	70	35	35	53	☑	☐	☐	☐	3	2.9	5.0	Poor structure from wire pruning
467	coast live oak	*Quercus agrifolia*	10.0	70	40	50	55	☑	☐	☐	☐	3	2.9	5.0	Poor structure from wire pruning
468	coast live oak	*Quercus agrifolia*	10.0	70	45	50	58	☑	☐	☐	☐	3	2.9	5.0	Poor structure from wire pruning
469	coast live oak	*Quercus agrifolia*	12.0	70	20	35	45	☑	☐	☐	☐	3	3.5	6.0	Significant lean
470	Stump	*N/A*	10.0	0	0	0	0	☑	☐	☐	☐	#N/A	#N/A	#N/A	Stump resprout

E M C

Planning for Success.

February 25, 2025
Revised March 4, 2025

Clay Tombs
Workbench
189 Walnut Ave
Santa Cruz, CA 95060
clay@workbenchbuildt.com

Re: Biotic Report
3500 Paul Sweet Rd., Santa Cruz County

Dear Mr. Tombs:

This Biotic Report includes the results of a reconnaissance-level site survey and assessment of potential biological impacts as the result of construction of a project on a residential home lot at 3500 Paul Sweet Road in Santa Cruz County. This report has been prepared in response to comments from the County of Santa Cruz dated November 1, 2024, requesting an evaluation of habitat at the project site for the potential for protected biological resources, such as oak woodland and special-status species.

A reconnaissance-level biological site assessment of the property (APN 025-013-37 and a portion of APN 102-061-10) was conducted on February 18, 2025, by EMC Planning Group associate biologist Rose Ashbach. The focus of the survey was to identify and evaluate biotic resources, special-status plant and wildlife species, sensitive natural habitats, and biological constraints potentially occurring on the property.

The habitats within the project parcel are a mix of annual grassland, disturbed soil/ruderal, a coast live oak grove, and trees and shrubs. The project site may provide habitat for special-status and/or migrating birds, and roosting habitat for special-status bats. The project site does not appear to provide habitat for other special-status species.

A grouping of coast live oaks are growing in the northwest corner of the site. This grove of trees is not considered oak woodland due to the size less than one acre and separation from other oak woodlands by a large stand of eucalyptus trees. Measures to avoid impacts to protected biological resources are recommended, including bird and bat surveys and tree removal permitting and tree removal mitigation.

Project Description

It is our understanding that the project aims to build a six-story, multi-family high density residential building at the site, including ground level parking, at APN 025-013-37. The project will also acquire a portion of the adjacent parcel (APN 102-061-10) for site access and utilities. The project would include 105 residential units and 75 garage parking stalls. The project utilizes the entire parcel and would result in the removal of native and ornamental trees and existing buildings.

Project History and Background

Santa Cruz County requires technical reports for the project, including a biotic report as outlined in the Santa Cruz County Code Chapter 16.32. An arborist report was provided and updated in March 2024. The project site is located outside of the Coastal Zone.

According to historical aerial photos, development of the site occurred in the late 1950s/early 1960s. Prior to development, the area was used for agriculture (Netronline 2025). Canopy cover within the project site has been lost over time (GoogleEarth 2025). Previous species composition of the site is unknown.

Survey Methodology

Prior to the field survey, aerial photographs, natural resource database accounts, and other relevant scientific literature were reviewed. This included searching the U.S. Fish and Wildlife Service (USFWS) *Endangered Species Program* (USFWS 2025a), California Department of Fish and Wildlife (CDFW) *California Natural Diversity Database* (CNDDB; CDFW 2025a), and California Native Plant Society (CNPS) *Inventory of Rare and Endangered Plants* (CNPS 2025) to identify special-status plants, wildlife, and habitats known to occur in the vicinity of the project site. Special-status species in this report are those listed as Endangered, Threatened, or Rare, or as Candidates for listing by the USFWS and/or CDFW; as Species of Special Concern or Fully Protected species by the CDFW; or as Rare Plant Rank 1B or 2B species by the CNPS. In addition, the *Arborist*

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Report and Tree Protection Plan, 3500 Paul Sweet Rd, Santa Cruz, CA, was reviewed ("Arborist Report", Davey Resources Group 2024).

EMC Planning Group biologist Rose Ashbach, M.S., conducted a reconnaissance-level biological survey of the site on February 17, 2025. Mrs. Ashbach has 15 years of experience as a restoration specialist and four years' experience in conducting biological surveys and writing technical documents.

At the time of the survey, the weather was mild (65 degrees Fahrenheit), with clear skies and wind approximately three miles per hour. Qualitative observations of plant cover, structure, and species composition were used to determine plant communities and wildlife habitats. The existing trees and adjacent forested area were assessed by walking around the site, the adjacent oak grove, and the eucalyptus grove. Wildlife was assessed by visual and/or auditory recognition, scat, and/or tracks.

Existing Biological Conditions

The approximately 0.62-acre project site has been developed with one residential unit, one studio/workshop, one carport, and one shed on the property. All the buildings are uninhabited and boarded up. The project site is surrounded by native and ornamental trees and shrubs, and a grove of coast live oak. A compacted decomposed granite driveway leads to the house, which at one time circled the entire residence. Currently, the driveway is experiencing significant erosion. Figure 1, Project Location, shows the project location. Figure 2, Site Photographs, documents habitat conditions at the site at the time of the survey.

A grove of oak trees, a bay, coast redwoods, and several small almond trees border the property to the north and west. A large stand of eucalyptus trees separates the grove of oaks adjacent to the property from other off-site oak woodlands. A mixture of native and ornamental trees and shrubs bounds the property to the south and east. Figure 3, Habitat Map, shows an aerial view of the project parcel.

The vegetation within the parcel is best described as annual grassland, and is dominated by non-native annual grasses. Due to the timing of the survey, all dominant non-native grass species are unknown. However, the following non-native grasses were identified: wildoats (*Avena* sp.), Italian ryegrass (*Festuca perennis*), rip-gut brome (*Bromus diandrus*), and nit grass (*Gastridium ventricosum*). Other species identified during the site visit

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include dove's-foot geranium (*Geranium molle*), Bermuda buttercup (*Oxalis pes-caprae*), horseweed (*Erigeron canadensis*), crane's bill (*Erodium* sp.), Italian thistle (*Carduus pycnocephalus*), bur clover (*Medicago polymorpha*), Buck's horn plantain (*Plantago coronopus*), and scarlet pimpernel (*Anagallis arvensis*). Perennial non-native or ornamental species are found throughout the parcel, including lily of the Nile (*Agapanthus* sp.), prickly pear (*Opunia* sp.), and French broom (*Genista monspessulana*).

A small patch of vegetation adjacent to the house was dominated by annual toad rush (*Juncus bufonius*) and annual grasses; other species included tall faltsedge (*Cyperus eragrostis*), horseweed, and cudweed (*Gnaphalium* sp.). These species are more characteristic of areas with moist soil. Increased soil moisture may be caused by leaking water infrastructure or drainage from hardscape upslope from the project.

Native and ornamental trees border the property to the south, and east. Trees here include coast redwood (*Sequoia sempervirens*), coast live oak (*Quercus agrifolia*), Peruvian pepper tree (*Schinus molle*), hollyleaf cherry (*Prunus ilicifolia*), Washington hawthorn (*Crataegus phaenopyrum*), magnolia (*Magnolia* sp.), cotoneaster shrubs (*Cotoneaster* sp.), and French broom. Understory species included Bermuda buttercup, annual grasses, poison oak (*Toxicodenderon diversilobum*), Italian thistle, and dove's-foot geranium.

An excavated soil pile is located north of the house within the property line. The vegetation growing in the pile is classified as ruderal, including Buck's-horn plantain, bur clover, hairy bittercress (*Cardamine hirsute*), horseweed, panic veldt grass (*Erharta erecta*), dwarf nettle (*Urtica urens*), borage (*Borago* sp.), Bermuda buttercup, annual mercury (*Mercurialis annua*), willow herb (*Epilobium ciliatum*).

The coast live oak grove along the north and west border consists of coast live oaks with California bay laurel (*Umbellularia californica*), and coast redwood. The understory includes many French broom sprouts, snowberry (*Symphorocarpus* sp.), poison oak, Italian thistle, California blackberry (*Rubus ursinus*), Pacific sanicle (*Sanicula crassicaulis*), and annual grasses. This vegetation community is approximately 0.54 acres in size and disconnected from oak woodlands north of the project site.

The following bird species were observed and/or heard at and within the vicinity of the project parcel, including: house finch (*Haemorhous mexicanus*), California towhee (*Melozone crissalis*), Anna's hummingbird (*Calypte anna*), red shouldered hawk (*Buteo*

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lineatus), dark eyed junco (*Junco hyemalis)*, oak titmouse (*Baeolophus inornatus*), chestnut-backed chickadee (*Poecile rufescens*), American crow (*Corvus brachyrhynchos*), American robin (*Turdus migratorius*), white crowned sparrow (*Zonotrichia leucophrys*), yellow-rumped warbler (*Setophaga coronata*), black phoebe (*Sayornis nigricans*).

A western fence lizard (*Sceloporus occidentalis*) was observed adjacent to the soil piles and deer prints were observed in the soft dirt east of the house. Other mammals are expected to occur within the project site include Columbian black-tailed deer (*Odocoileus hemionus columbianus*), coyote (*Canis latrans*), bobcat (*Lynx rufus*), eastern gray squirrel (*Sciurus carolinensis*), western grey squirrel (*Sciurus griseus*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), and Virginia opossum (*Didelphis virginiana*) (iNaturalist 2025); common reptiles may include western fence lizard and common garter snake (*Thamnophis sirtalis*). Species of small rodents including mice (*Mus musculus*, *Reithrodontomys megalotis*, and *Peromyscus maniculatus*), and California vole (*Microtus californicus*) also likely occur.

Special-Status Plant and Wildlife Species or Protected Habitats

Special-status plant species known to occur in a three-mile project vicinity were evaluated for their potential to occur on the project site. Information on special-status species, including listing status, suitable habitat conditions, and potential to occur on the site is presented in Tables 1 and 2, Special-Status Species with Potential to Occur in the Project Vicinity and shown on Figure 4, Special-Status Species.

Special-Status Plant Species. A number of special-status plants have been reported as occurring within the overall project vicinity. Of these records, non-historical observations include Santa Cruz clover (*Trifolium buckwestiorum*), Santa Cruz tarplant (*Holocarpha macrodenia*), robust spineflower (*Chorizanthe robusta* var. *robusta*), and saline clover (*Trifolium hydrophilum*). No special-status plant species were observed during the time of the survey. Additionally, because the project site consists of disturbed habitat, there are few native species present, and there is little potential to support special-status plants based on the absence of suitable habitat. Information on special-status plant species, including listing status, suitable habitat conditions, and potential to occur on the project site is presented in Table 1, Special-Status Plant Species with Potential to Occur in the Project Vicinity.

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Special-Status Wildlife Species. Special-status wildlife species reported as occurring in the project vicinity were also evaluated for their potential to occur on the project site. These species include California giant salamander (*Anodonta californiensis*), Monarch butterfly (*Danaus plexippus*), Santa Cruz black salamander (*Aneides flavipunctatus niger*), Northern California legless lizard (*Anniella pulchra*), and others. With the exception of birds and bats, which could potentially nest or roost in trees, non-native or native vegetation, or structures on or near the project site, the potential for any special-status wildlife species to occur on the project site is unlikely. Information on special-status wildlife species, including listing status, suitable habitat conditions, and potential to occur on the project site is presented in Table 2, Special-Status Wildlife Species with Potential to Occur in the Project Vicinity.

Townsends big eared bat (*Corynorhinus townsendii*), a California state Species of Special Concern, is known to occur within the regional vicinity. Townsend's big eared bat may inhabit a wide variety of habitats including grasslands, woodlands, and forests and required large cavities for roosting (abandoned buildings, spaces under tree bark, caves, etc.). Construction activities at the project site could potentially disturb special-status roosting bats, if present.

Various bird species including Cooper's hawk or migrating nesting birds or raptors may nest throughout the project site, including on open ground, shrubs, trees, or in buildings. Construction activities including ground and vegetation disturbance, tree removal, and demolition of the onsite buildings may impact nesting birds protected under the federal Migratory Bird Treaty Act and California Fish and Game Code, should nesting birds be present during site preparation and construction.

Local Codes and Ordinances

The County of Santa Cruz General Plan ARC-5.1.9 (LCP) Significant Tree Removal Ordinance provides protection for significant trees and other major vegetation within the county.

Santa Cruz County Code Chapter 16.32 Sensitive Habitat Protection. This ordinance requires that no person shall commence any development activity within an area of biotic concern until a biotic approval has been issued. A biotic assessment shall be required for all development activities and applications in areas of biotic concern. A biotic report shall be required if the Environmental Coordinator determines on the basis

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of the biotic assessment that further information is required to ensure protection of the sensitive habitat consistent with General Plan policies.

This biotic report fulfills the requirements under Chapter 16.32 of the Santa Cruz County Code.

Trees

According to the Arborist Report dated March 2024, 17 trees are recommended for removal under current plans (Davey 2024). However, the project plans have changed and the report is currently being revised to address the need for additional tree removal. The revised arborist report will also contain recommendations for tree removal, protection, and replacement. No tree removal permit is required through Santa Cruz County, as the project is located outside of the Coastal Zone. Figure 5, Impact Map, shows project impacts.

Sensitive Habitats

The project site does not contain sensitive habitats. An oak grove is located to the north of the site and borders the project to the north and west. The project will remove trees within this grove. The United States Forest Service requires a minimum area of one acre to categorize forest land (USFS 2025). The grove of oaks is not considered an oak woodland, as the size of the grove 0.54 acres. Due to the small size of the oak grove and distance and isolation from the nearest occurrences of continuous oak woodland, the oak grove is not considered oak woodland.

Aquatic Features and Riparian Vegetation

According to the National Wetland Inventory and as observed on the biological survey, no wetlands or waters are found within the project boundary. A storm drainage channel and system of culverts is located approximately 200 feet to the northwest and Anna's Creek is located 1,000 feet west of the project site. The distinct vegetation located adjacent to the house foundation and within the driveway is not considered a wetland feature as no hydrologic indicators are present, and the soil is imported and compacted decomposed granite. There is no riparian vegetation within the project site. Impacts to aquatic features or riparian vegetation will not occur as a result of the proposed project.

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Wildlife Movement

Wildlife movement corridors provide connectivity between habitat areas, enhancing processes like nutrient flow, gene flow, seasonal migration, pollination, and predator-prey relationships. Increasing connectivity is a critical strategy for addressing habitat loss and fragmentation, a top threat to biodiversity.

The project site is not located within any previously defined essential connectivity areas as mapped by the *California Essential Habitat Connectivity Project* (CDFW 2025c). The project site is not likely to facilitate major wildlife movement due to the current disturbance from the past development, residential development to the east, a cemetery to the west, and rural residential development to the north. As such, the proposed project would have a less-than-significant impact on wildlife movement.

Recommended Measures

Loss or harm to special-status species is considered significant per federal, state, and local regulations. The following measures are recommended to avoid or minimize impacts to protected biological resources.

1. **Nesting Birds and Raptors.** If possible, building demolition and construction should be initiated outside of the nesting bird season (January 15 through September 15). If construction must begin during the nesting bird season, a pre-construction survey for nesting birds should be conducted by a qualified Santa Cruz County-approved biologist to ensure that no nests would be disturbed during project activities.

   If no nesting activity is observed, a letter report confirming absence shall be prepared and submitted to the County of Santa Cruz Planning Department and no further action is required.

   If an active migratory bird or raptor nest is found, follow-up surveys would be needed to check on the nest and determine when the nest is no longer active. An appropriate buffer between each nest and active construction would also be established. Construction within the buffer area would not be able to proceed until the nest is no longer active.

2. **Protected Bat Species**. To avoid impacts to special-status bat species, approximately 14 days prior to building demolition and construction activities, a qualified Santa Cruz County-approved biologist should conduct a habitat

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assessment for bats and potential roosting sites in trees or buildings within 50 feet of the construction site. A pre-construction survey for nesting birds and roosting bats can be conducted simultaneously.

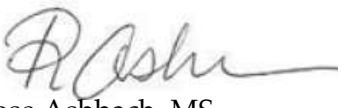
If no roosting sites or bats are found, a letter report confirming absence shall be prepared and submitted to the County of Santa Cruz Planning Department and no further action is required. If special-status bat species or roosting sites are found, bats shall not be disturbed without specific notice to and consultation with the California Department of Fish and Wildlife.

Conclusion

With implementation of the recommended measures above, potential impacts to protected biological resources as a result of the project will be avoided and/or minimized.

We hope this evaluation meets your needs at this time. Please contact me at ashbach@emcplanning.com if you have any questions or concerns.

Sincerely,



Rose Ashbach, MS
Associate Biologist

Attachments:

Figure 1, Project Location
Figure 2, Site Photographs
Figure 3, Habitat Map
Figure 4, Special-Status Species Recorded in the Project Vicinity
Figure 5, Impact Map

Table 1, Special-Status Plant Species with Potential to Occur in the Project Vicinity
Table 2, Special-Status Wildlife Species with Potential to Occur in the Project Vicinity

Exhibit J

Sources

Baldwin, B. G., D. H. Goldman, et al. 2012. *The Jepson Manual: Vascular Plants of California,* University of California Press.

Calflora Database. 2025. *Calflora: Information on California plants for education, research and conservation online database*. Berkeley, California. Accessed February 2025. https://www.calflora.org/

California Department of Fish and Wildlife (CDFW). 2025a. *California Natural Diversity Database (CNDDB)* online database. Accessed February 2025https://wildlife.ca.gov/data/cnddb

CDFW. 2025b. *Biogeographic Information and Observation System (BIOS)* online database. Sacramento, California. Accessed February 2025. http://bios.dfg.ca.gov

CDFW. 2025c. *California Natural Community List*. Sacramento, California. Accessed February 2025. https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities

CDFW. 2025d. *California Essential Habitat Connectivity Project*. Sacramento, California. Accessed February 2025. https://wildlife.ca.gov/Conservation/Planning/Connectivity/CEHC

California Invasive Plant Council (Cal-IPC). 2025. *Cal-IPC Invasive Plant Inventory* online database. Accessed February 2025. https://www.cal-ipc.org/plants/inventory/

California Native Plant Society (CNPS). 2025. *Inventory of Rare and Endangered Plants of California online database.*. Accessed February 2025. http://www.rareplants.cnps.org

Davey Resources Group. 2024. *Arborist Report and Tree Protection Plan, 3500 Paul Sweet Rd, Santa Cruz, CA,* UPDATED March 2024.

GoogleEarth. 2025. Google Earth Application. Accessed February 2025.

iNaturalist. 2025. Observations. Accessed February 2025. https://www.inaturalist.org/observations

Exhibit J

Netronline. 2025. Historic Aerials. Accessed February 25, 2025. https://www.historicaerials.com/viewer

Jepson Flora Project. 2025. *Jepson eFlora* online database. Accessed February 2025. https://ucjeps.berkeley.edu/eflora/

Sawyer, J. O., T. Keeler-Wolf, and J.M. Evens. 2009. *A Manual of California Vegetation*. California Native Plant Society, Sacramento, CA.

Sibley, David A. 2016. *The Sibley Field Guide to Birds of Western North America: Second Edition*. New York, Alfred A. Knopf.

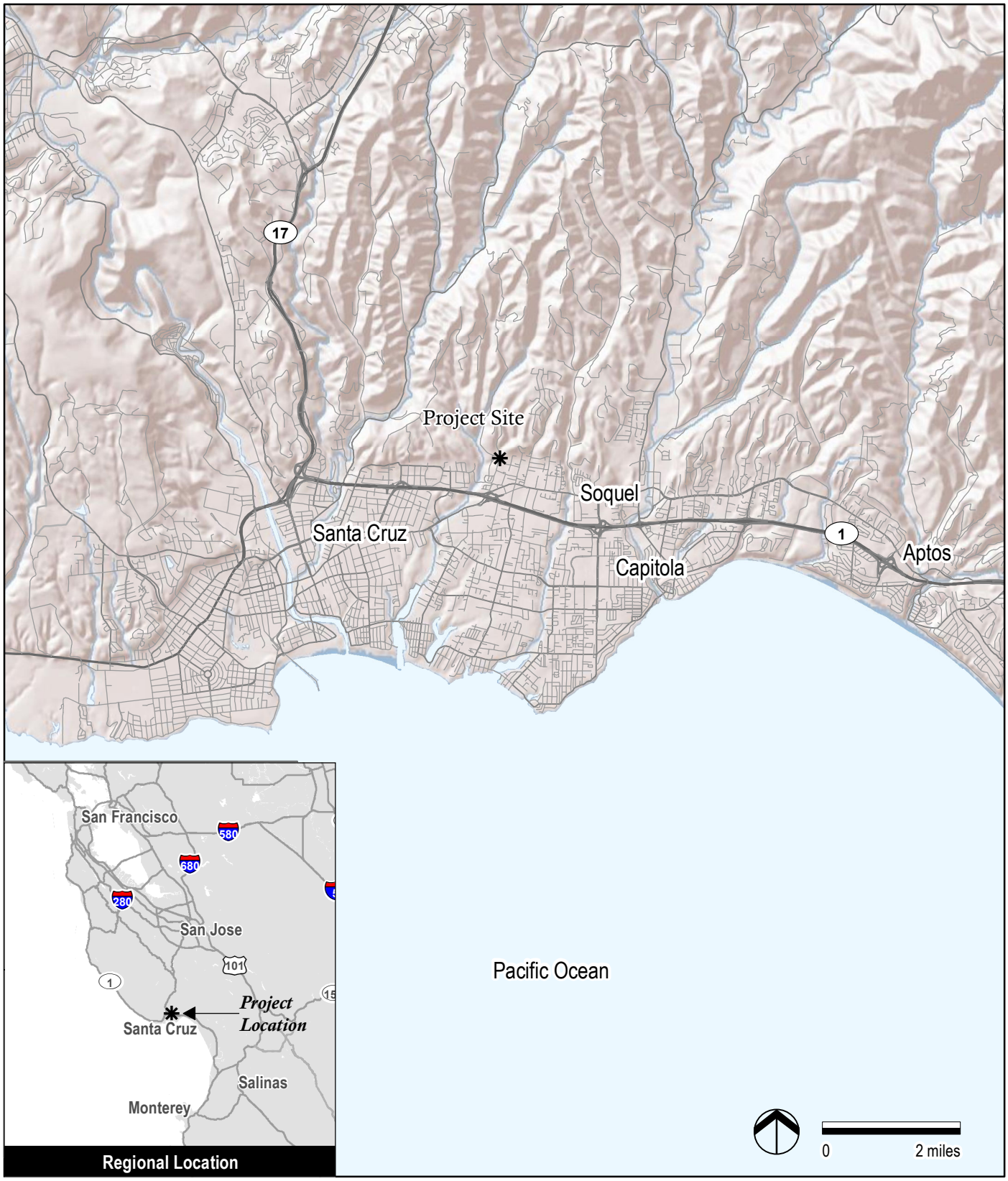
U.S. Forest Service (USFS). 2025. Forest Definitions Applied in Reporting. Accessed February 25, 2025. https://research.fs.usda.gov/programs/fia/forestdefinitions

U.S. Fish and Wildlife Service (USFWS). 2025a. *Endangered Species Program* online database. Species list for Santa Cruz County. Washington, D.C. Accessed February 2025. http://www.fws.gov/endangered/

USFWS. 2025b. *National Wetlands Inventory* online database. Washington, D.C. Accessed February 2025. http://www.fws.gov/wetlands/

USFWS. 2025c. *Critical Habitat for Threatened and Endangered Species* online mapper. Accessed February 2025. https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77

Exhibit J



Source: ESRI 2024

Figure 1

Project Location

3500 Paul Sweet Road Biotic Report

Exhibit J

Photo 1. Northeast corner of parcel looking southwest at annual grassland and residence.

Photo 2. North of project site looking south at onsite buildings.

Photo 3. Bird nest within rafters of the existing carport within the parcel.

Photo 4. Area with annual grasses and rushes adjacent to residence, within compacted gravel driveway..

Photo 5. Paul Sweet Road looking south at project parcel with steep slopes, exposed roots, and annual herbs.

Photo 6. Soil pile within project site.

Source: EMC Planning Group 2025

Figure 2

Project Photos

Source: ESRI 2024, Google Earth 2024

Figure 3

Habitat Map

3500 Paul Sweet Road Biotic Report

Exhibit J

0 4,850 feet

Source: EMC 2024, ESRI 2024, CDFW CNDDB 2025

Project Site
3-Mile Buffer
Special-Status Plants
Special-Status Wildlife

Figure 4

Special-Status Species

3500 Paul Sweet Road Biotic Report

Exhibit J

Source: ESRI 2025, EMC Planning 2025, IFLAND Engineers 2025

Figure 5

Project Impacts

Table 1 Special-Status Plant Species with the Potential to Occur in the Project Vicinity

Species	Status (Federal/State/ CNPS)	Suitable Habitat Description	Potential to Occur on the Project Site
Anderson's manzanita *(Arctostaphylos andersonii)*	--/--/1B.2	Broadleaved upland forest, chaparral, and North Coast coniferous forest. Known only from the Santa Cruz Mountains. Prefers open sites in redwood forest; elevation 180-800m. Blooming Period: November - April	Unlikely. Not observed, no suitable upland forest, chaparral, or north coast coniferous forest present.
Arcuate bush-mallow *(Malacothamnus arcuatus)*	--/--/1B.2	Chaparral, in gravelly alluvium; elevation 80-355m. Blooming Period: April - September	Unlikely. No suitable chaparral present.
Ben Lomond buckwheat *(Eriogonum nudum* var. *decurrens)*	--/--/1B.1	Chaparral, cismontane woodland, lower montane coniferous forest, and ponderosa pine sand hills; elevation 50-800m. Blooming Period: June - October	Unlikely. No suitable chaparral, cismontane woodland, lower montane coniferous forest, or ponderosa pine sand hills present.
Bent-flowered fiddleneck *(Amsinckia lunaris)*	--/--/1B.2	Coastal bluff scrub, cismontane woodland, and valley and foothill grassland, on decomposed shale soils; elevation 3-500m. Blooming Period: March - June	Unlikely. No decomposed shale soils within the project site.
Blasdale's bent grass *(Agrostis blasdalei)*	--/--/1B	Sandy or gravelly soil close to rocks, often in nutrient-poor soil with sparse vegetation. Blooming Period: May - July	Unlikely. No suitable nutrient poor, gravely soil with sparse vegetation present.
Bonny Doon manzanita *(Arctostaphylos silvicola)*	--/--/1B.2	Chaparral, closed-cone coniferous forest, and lower montane coniferous forest. Known only from inland marine Zayante sands in Santa Cruz County; elevation 120-390m. Blooming Period: February – March	Unlikely. No suitable chaparral, closed-cone forest, and lower montane coniferous forest.
Bristly sedge *(Carex comosa)*	--/--/2B.1	Coastal prairie, marshes and swamps (lake margins), and valley and foothill grassland; elevation 0-625m. Blooming Period: May - September	Unlikely. No suitable marshes, swamps or coastal prairie habitats. Not observed.
Chaparral ragwort *(Senecio aphanactis)*	--/--/2B.2	Cismontane woodland and coastal scrub. Prefers drying alkaline flats; elevation 20-575m. Blooming Period: January - April	Unlikely. No suitable drying alkaline flats present.
Choris' popcorn-flower *(Plagiobothrys chorisianus* var. *chorisianus)*	--/--/1B.2	Chaparral, coastal scrub, coastal prairie, mesic sites; elevation 15-100m. Blooming Period: March - June	Unlikely. No suitable mesic site within coastal prairie, scrub, or chaparral habitats.
Congdon's tarplant *(Centromadia parryi* spp. *congdonii)*	--/--/1B.1	Valley and foothill grassland (alkaline); elevation 1-230m. Known to occur on various substrates, and in disturbed and ruderal (weedy) areas. Blooming Period: June - November	Unlikely. Although disturbed and ruderal habitats are present, the nearest recorded observation is located outside of the 3-mile project vicinity.
Coyote ceanothus *(Ceanothus ferrisiae)*	FE/--/1B.1	Serpentine sites in chaparral, coastal scrub, and valley and foothill grassland; elevation 120-460m. Blooming Period: January - May	Unlikely. No suitable serpentine sites in chaparral, coastal scrub, or grassland present.
Deceiving sedge *(Carex saliniformis)*	--/--/1B.2	Wet areas in coastal prairie, coastal scrub, meadows and seeps, and coastal salt marshes and swamps; elevation 3-230m. Blooming Period: June - July	Unlikely. No suitable wet areas in coastal prairie, scrub, or salt marsh/scrub present.

Table 1

Species	Status (Federal/State/ CNPS)	Suitable Habitat Description	Potential to Occur on the Project Site
Dudley's lousewort *(Pedicularis dudleyi)*	--/SR/1B.2	Chaparral, North Coast coniferous forest, valley and foothill grassland. Deep shady woods of older coast redwood forests, also in maritime chaparral; elevation 100-490m. Blooming Period: April - June	Unlikely. No suitable chaparral, north coast coniferous forest, or grassland. Outside of elevation range.
Hall's bush-mallow *(Malacothamnus hallii)*	--/--/1B.2	Chaparral, some populations on serpentine; elevation 10-550m. Blooming Period: May - September	Unlikely. No suitable chaparral present.
Hooker's manzanita *(Arctostaphylos hookeri* ssp. *hookeri)*	--/--/1B.2	Sandy soils in coastal scrub, chaparral, and closed-cone forest habitats; evergreen; elevation 45-215m. Blooming Period: February - April	Unlikely. No suitable coastal scrub, chaparral, or closed cone forest present.
Humboldt County Milk Vetch *(Astragalus agnicidus)*	--/SE/1B.1	Broadleafed upland forest, north coast coniferous forest. Disturbed openings in partially timbered forest lands; also along ridgelines; south aspects. 115-670 m.	Unlikely. No suitable disturbed openings in partially timbered forest lands; outside of elevation range.
Kellogg's horkelia *(Horkelia cuneata* ssp. *sericea)*	--/--/1B.1	Closed-cone coniferous forest, maritime chaparral, coastal scrub, sandy or gravelly openings; elevation 10-200m. Blooming Period: April - September	Unlikely. No suitable gravelly or sandy openings in closed cone forest, maritime chaparral, or coastal scrub.
Loma Prieta hoita *(Hoita strobilina)*	--/--/1B.1	Wet areas on serpentine substrate in chaparral, cismontane woodland, and riparian woodland; elevation 30-860m. Blooming Period: May - October	Unlikely. No suitable wet areas on serpentine substrate present.
Marsh microseris *(Microseris paludosa)*	--/--/1B.2	Closed-cone coniferous forest, cismontane woodland, coastal scrub, valley and foothill grassland; elevation 5-300m. Blooming Period: April - June	Unlikely. No suitable openings in Closed-cone coniferous forest, cismontane woodland, coastal scrub, valley and foothill grassland.
Marsh sandwort *(Arenaria paludicola)*	FE/SE/1B.1	Sandy openings in freshwater or brackish marshes and swamps; elevation 3-170m. Blooming Period: May - August	Unlikely. No suitable swamps or marshes present.
Minute pocket moss *(Fissidens pauperculus)*	--/--/1B.2	North coast coniferous forest. Moss growing on damp soil along the coast; elevation 10-100m. Evergreen	Unlikely. No suitable north coast coniferous forest present.
Monterey gilia *(Gilia tenuiflora* ssp. *arenaria)*	FE/ST/1B.2	Maritime chaparral, cismontane woodland, coastal dunes, coastal scrub, sandy openings; elevation 0-45m. Blooming Period: April - June	Unlikely. No suitable sandy openings in chaparral, coastal dunes, coastal scrub, or woodland habitats.
Monterey spineflower *(Chorizanthe pungens* var. *pungens)*	FT/--/1B.2	Sandy openings in maritime chaparral, cismontane woodland, coastal dunes, coastal scrub, and valley and foothill grassland; elevation 3-450m. Blooming Period: April - June	Unlikely. No suitable sandy openings in woodlands, chaparral, dunes, or scrub habitat.
Northern curly-leaved monardella *(Monardella sinuata ssp. nigrescens)*	--/--/1B.2	Sandy sites in chaparral, coastal dunes, coastal scrub, and lower montane coniferous forest (ponderosa pine sandhills); elevation 0-300m. Blooming Period: April - September	Unlikely. No suitable sandy sites in chaparral, coastal dunes, coastal scrub, or lower coniferous forest present.
Pacific Grove clover *(Trifolium polyodon)*	--/SR/1B.1	Closed-cone coniferous forest, coastal prairie, meadows and seeps, valley and foothill grassland, mesic; elevation 5-120m. Blooming Period: April - June	Unlikely. No suitable close cone coniferous forest, coastal prairie, or meadows and seeps in grasslands.

Exhibit J

Species	Status (Federal/State/ CNPS)	Suitable Habitat Description	Potential to Occur on the Project Site
Pajaro manzanita *(Arctostaphylos pajaroensis)*	--/--/1B.1	Sandy soils in chaparral habitat; evergreen; elevation 30-760m. Blooming Period: December - March	Unlikely. No suitable sandy soils in chaparral habitat.
Perennial goldfields *(Lasthenia californica* ssp. *macrantha)*	--/--/1B.2	Coastal bluff scrub, coastal dunes, coastal scrub; elevation 5-185 m. Blooming Period: January-November.	Unlikely. No suitable coastal bluff scrub, coastal dunes, or coastal scrub.
Point Reyes horkelia *(Horkelia marinensis)*	--/--/1B.2	Sandy sites in coastal dunes, coastal prairie, and coastal scrub; elevation 5-755m. Blooming Period: May - September	Unlikely. No suitable sandy sites in coastal dunes, coastal prairie, or coastal scrub habitat.
Robbins' broomrape *(Aphyllon robbinsii)*	--/--/1B.1	Coastal bluff scrub, coastal dunes. Rocky or sandy soil on bluffs, cliffs, landslides, or shell mounts; possibly on sand dunes. Only confirmed host is *Eriophyllum staechadifolium*. Blooming Period: April - July.	Unlikely. No suitable coastal bluff scrub, coastal dunes, rocky or sandy bluffs, cliffs, or dunes present.
Robust spineflower *(Chorizanthe robusta* var. *robusta)*	FE/--/1B.1	Sandy or gravelly openings in cismontane woodland, coastal dunes, and coastal scrub; prefers sandy terraces and bluffs or loose sand; elevation 3-300m. Blooming Period: April - July	Unlikely. No sandy terraces or loose sand.
Saline clover *(Trifolium hydrophilum)*	--/--/1B.2	Marshes and swamps, valley and foothill grassland, and vernal pools. Prefers wet, alkaline sites; elevation 0-300m. Blooming Period: April - June	Unlikely. No suitable marshes or swamps or wet alkaline sites.
San Francisco collinsia *(Collinsia multicolor)*	--/--/1B.2	Serpentine sites in closed cone coniferous forest and coastal scrub. Prefers decomposed shale (mudstone) mixed with humus; elevation 30-250m. Blooming Period: March - May	Unlikely. No suitable serpentine sites in closed cone forest or scrub.
San Francisco popcornflower *(Plagiobothrys diffusus)*	--/SE/1B.1	Valley and foothill grassland, and coastal prairie. Historically from grassy slopes with marine influence; elevation 60-485m. Blooming Period: March - June	Unlikely. No suitable low growing grassy slopes.
Sand-loving wallflower *(Erysimum ammophilum)*	--/--/1B.2	Maritime chaparral, coastal dunes, coastal scrub, sandy openings; elevation 0 – 60m. Blooming Period: February - June	Unlikely. No suitable sandy openings in chaparral, coastal dunes, coastal scrub present.
Santa Cruz clover *(Trifolium buckwestiorum)*	--/--/1B.1	Broadleaved upland forest, cismontane woodland, and coastal prairie; prefers moist grassland and gravelly margins; elevation 105-610m. Blooming Period: April - October	Unlikely. Marginal habitat present. Outside of elevation range.
Santa Cruz cypress *(Hesperocyparis abramsiana* var. *abramsiana)*	FE/SE/1B.2	Closed-cone coniferous forest and lower montane coniferous forest in the Santa Cruz Mountains on sandstone and granitic derived soils; elevation 300-800m. Evergreen	Unlikely. No suitable closed cone forest present. Outside of elevation range.
Santa Cruz microseris *(Stebbinsoseris decipiens)*	--/--/1B	Broadleaved upland forest, closed-cone coniferous forest, chaparral, coastal prairie, coastal scrub, valley and foothill grassland, open areas, sometimes serpentine; elevation 10-500m. Blooming Period: April - May	Unlikely. No suitable open areas in upland forest, closed cone forest, chaparral, coastal prairie, or scrub present.
Santa Cruz Mountains beardtongue *(Penstemon rattanii* var. *kleei)*	--/--/1B.2	Chaparral and lower montane coniferous forest. Sandy shale slopes in transition zone between forest and chaparral; elevation 400-1100m. Blooming Period: May - June	Unlikely. No suitable sandy shale slopes chaparral or lower montane coniferous forest present.

Table 1

Species	Status (Federal/State/ CNPS)	Suitable Habitat Description	Potential to Occur on the Project Site
Santa Cruz Mountains pussypaws *(Calyptridium parryi* var. *hesseae)*	--/--/1B.1	Sandy or gravelly openings in chaparral and cismontane woodland; elevation 305-1530m. Blooming Period: May - August	Unlikely. No suitable sandy or gravelly openings in chaparral or cismontane woodlands. Outside of elevation range.
Santa Cruz tarplant *(Holocarpha macradenia)*	FT/SE/1B.1	Coastal prairie, coastal scrub, and valley and foothill grassland; often on clay or sandy soils; elevation 10-220m. Blooming Period: June - October	Unlikely. No suitable coastal prairie on the project site.
Santa Cruz wallflower *(Erysimum teretifolium)*	FE/SE/1B.1	Lower montane coniferous forest and chaparral. Pine Parkland Area, on inland marine sands (Zayante coarse sand); elevation 120-610m. Blooming Period: March - July	Unlikely. No suitable coniferous forest or chaparral present.
Scotts Valley polygonum *(Polygonum hickmanii)*	FE/SE/1B.1	Valley and foothill grassland. Purisima sandstone or mudstone with a thin soil layer, vernally moist due to runoff; elevation 210-250m. Blooming Period: May - October	Unlikely. No vernally moist sandstone or mudstone present. Outside of elevation range.
Scotts Valley spineflower *(Chorizanthe robusta* var. *hartwegii)*	FE/--/1B.1	Meadows, and valley and foothill grassland. In grasslands with mudstone and sandstone outcrops; elevation 230-245m. Blooming Period: April - July	Unlikely. No suitable grassland with mudstone and sandstone outcrops. Outside of elevation range.
Seaside bird's-beak *(Cordylanthus rigidus* ssp. *littoralis)*	--/SE/1B.1	Closed-cone coniferous forest, maritime chaparral, cismontane woodland, coastal dunes, coastal scrub, sandy often disturbed sites; elevation 0-215m. Blooming Period: May - October	Unlikely. No suitable sandy areas in closed cone forest, chaparral, dunes, scrub, or woodland habitat.
Slender silver-moss *(Anomobryum julaceum)*	--/--/2B.2	Broadleaved upland forest, lower montane coniferous forest, North Coast coniferous forest, damp rocks and soil, usually seen on road cuts; elevation 100-1000m. Moss	Unlikely. No suitable Broadleaved upland forest, lower montane coniferous forest, North Coast coniferous forest.
Smooth lessingia *(Lessingia micradenia* var. *glabrata)*	--/--/1B.2	Chaparral; endemic to Santa Clara County. Serpentine, often on roadsides; elevation 120-485m. Blooming Period: July - November	Unlikely. No suitable chaparral present. Outside of range.
Swamp harebell *(Campanula californica)*	--/--/1B.2	Mesic sites in bogs and fens, closed-cone coniferous forest, coastal prairie, meadows and seeps, freshwater marshes and swamps, and North Coast coniferous forest; elevation 1-405m. Blooming Period: June - October	Unlikely. No mesic sites in bogs or fens in closed cone forests, prairies, meadows or seeps.
Tear drop moss *(Dacryophyllum falcifolium)*	--/--/1B.3	Carbonate substrates in North Coast coniferous forest; elevation 50-275m.	Unlikely. No suitable carbonate substrates in North Coast coniferous forest present.
White-flowered rein orchid *(Piperia candida)*	--/--/1B.2	Broadleaf upland forest, lower montane coniferous forest, and North Coast coniferous forest; sometimes serpentine; elevation 30-1310m. Blooming Period: May - September	Unlikely. No suitable Broadleaved upland forest, lower montane coniferous forest, North Coast coniferous forest present.
White-rayed pentachaeta *(Pentachaeta bellidiflora)*	FE/SE/1B.1	Valley and foothill grassland. Open dry, rocky slopes and grassy areas, often on soils derived from serpentine bedrock; elevation 35-620m. Blooming Period: March - May	Unlikely. No suitable dry rocky slopes derived from serpentine bedrock in grassland habitat.

Exhibit J

Species	Status (Federal/State/ CNPS)	Suitable Habitat Description	Potential to Occur on the Project Site
Woodland woollythreads *(Monolopia gracilens)*	--/--/1B.2	Serpentine, open sites in broadleaved upland forest, chaparral, cismontane woodland, North Coast coniferous forest, and valley and foothill grassland; elevation 100-1200m. Blooming Period: March - July	Unlikely. No suitable serpentine soils with open sites in broadleaved upland forest, chaparral, cismontane woodland, North Coast coniferous forest, and valley and foothill grassland. Outside of elevation range.
Yadon's rein orchid *(Piperia yadonii)*	FE/--/1B.1	Sandy sites in coastal bluff scrub, closed cone coniferous forest, maritime chaparral; elevation 10-510m. Blooming Period: May - August	Unlikely. No suitable sandy sites in coastal bluff scrub or closed cone forest present.

SOURCE: CDFW 2025, CNPS 2025

NOTE: Status Codes:

Federal (USFWS)

FE: Listed as Endangered under the Federal Endangered Species Act.

FT: Listed as Threatened under the Federal Endangered Species Act.

FC: A Candidate for listing as Threatened or Endangered under the Federal Endangered Species Act.

FSC: Species of Special Concern.

FD: Delisted under the Federal Endangered Species Act.

State (CDFW)

SE: Listed as Endangered under the California Endangered Species Act.

ST: Listed as Threatened under the California Endangered Species Act.

SR: Listed as Rare under the California Endangered Species Act.

SC: A Candidate for listing as Threatened or Endangered under the California Endangered Species Act.

SSC: Species of Special Concern.

SFP: Fully Protected species under the California Fish and Game Code.

SD: Delisted under the California Endangered Species Act.

CNPS Rare Plant Ranks and Threat Code Extensions

1B: Plants that are considered Rare, Threatened, or Endangered in California and elsewhere.

2B: Plants that are considered Rare, Threatened, or Endangered in California, but more common elsewhere.

.1: Seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat).

.2: Fairly endangered in California (20-80% occurrences threatened).

.3: Not very endangered in California (<20% of occurrences threatened or no current threats known).

Table 2 Special-Status Wildlife Species with the Potential to Occur in the Project Vicinity

Species	Status (Federal/State)	Suitable Habitat Description	Potential to Occur on Project Site
American badger *(Taxidea taxus)*	--/SSC	Most abundant in drier, open stages of most shrub, forest, and herbaceous habitats. Need sufficient food and open, uncultivated ground with friable soils to dig burrows. Prey on burrowing rodents.	Unlikely. Not a large enough area to sustain a badger. No burrows observed.
American peregrine falcon *(Falco peregrinus anatum)*	FD/SD,SFP	Occurs near wetlands, lakes, rivers, or other waters on cliffs, banks, dunes, mounds, and human-made structures. Nest consists of a scrape on a depression or ledge in an open site.	Unlikely. No suitable open sites near wetlands.
Bank swallow *(Riparia riparia)*	--/ST	Highly colonial species that nests in alluvial soils along rivers, streams, lakes, and ocean coasts. Nesting colonies only occur in vertical banks or bluffs of friable soils at least one meter tall, suitable for burrowing with some predator deterrence values. Breeding colony present in Salinas River.	Unlikely. No suitable vertical banks of stream for nesting with exposed soils and predator deterrence values.
Black swift *(Cypseloides niger)*	--/SSC	Breeds in small colonies on cliffs behind or adjacent to waterfalls in deep canyons and sea bluffs above surf; forages widely.	Unlikely. No suitable cliffs or waterfalls for nesting.
Burrowing owl *(Athene cunicularia)*	--/SSC, SC	Open, dry, annual or perennial grasslands, desert, or scrubland, with available small mammal burrows.	Unlikely. No suitable large open grasslands with burrows on project site.
California black rail *(Laterallus jamaicensis coturniculus)*	--/ST	Inhabits freshwater marshes, wet meadows, and shallow margins of saltwater marshes bordering larger bays. Needs water depth of about 1 inch that does not fluctuate during the year and dense vegetation for nesting.	Unlikely. No suitable freshwater marshes, meadows, or bays.
California brackishwater snail *(mimic tryonia)* *(Tryonia imitator)*	--/SSC	Aquatic, found on rocks and in gravel of riffles in cool, swift, clear streams.	Unlikely. No suitable aquatic habitat within project area.
California condor (Gymnogyps californianus)	FE/SE &FP	Requires vast expanses of open savannah, grasslands, and foothill chaparral in mountain ranges of moderate altitude. Deep canyons containing clefts in the rocky walls provide nesting sites. Forages up to 100 miles from roost/nest.	Unlikely. Nests in canyons and cliffs in Pinnacles National Monument or Big Sur.
California giant salamander *(Anodonta californiensis)*	--/SSC	Known from wet coastal forests near streams ad seeps from Mendocino County south to Monterey County and east to Napa County. Aquatic larvae found in cold, clear streams, occasionally in lakes and ponds. Adults known from wet forests under rocks and logs near streams and lakes.	Unlikely. No suitable cold clear streams in wet coastal forest within project area.
California least tern *(Sternula antillarum browni)*	FE/SE	Nests along the coast from San Francisco Bay south to northern Baja California. Colonial breeder on bare or sparsely vegetated, flat substrates (sand beaches, alkali flats, landfills, or paved areas).	Unlikely. No suitable bare or sparsely vegetated beaches, alkali flats, or landfills for nesting
California red-legged frog *(Rana draytonii)*	FT/SSC	Rivers, creeks, and stock ponds with pools and overhanging vegetation. Requires dense, shrubby or emergent riparian vegetation, and prefers short riffles and pools with slow-moving, well-oxygenated water. Needs upland habitat to aestivate (remain dormant during dry months) in small mammal burrows, cracks in the soil, or moist leaf litter.	Unlikely. No records within the project vicinity.

Table 2

Species	Status (Federal/State)	Suitable Habitat Description	Potential to Occur on Project Site
California Ridgway's rail *(Rallus obsoletus obsoletus)*	FE/SE	Found in saltwater and brackish marshes, traversed by tidal sloughs in the vicinity of San Francisco Bay. Associated with abundant growths of pickleweed, but feeds away from cover on invertebrates from mud-bottomed sloughs.	Unlikely. No suitable saltwater or brackish water marshes or tidal sloughs.
California tiger salamander *(Ambystoma californiense)*	FT/ST	Grasslands and oak woodlands near seasonal pools and stock ponds in central and coastal California. Needs upland habitat to aestivate (remain dormant during dry months) in small mammal burrows, cracks in the soil, or moist leaf litter. Requires seasonal water sources that persist into late March for breeding habitat.	Unlikely. No suitable vernal ponds for breeding or suitable grassland habitat for aestivation.
Coho salmon *(Oncorhynchus kisutch)*	FE/SE	Freshwater habitats; requires beds of loose, silt-free, coarse gravel for spawning, covered cool water, and sufficient oxygen levels.	Unlikely. No aquatic habitat on the project site.
Cooper's hawk *(Accipter cooperii)*	--/WL	Oak or riparian woodlands.	Possible. Suitable woodland habitat present adjacent to project.
Crotch bumble bee *(Bombus crotchii)*	--/SCE	Open grassland and scrub habitats. Require flowering plants and suitable nesting sites. Documented food plants include *Asclepias* sp., *Chaenactis* sp., *Lupinus* sp., *Medicago* sp., *Phacelia* sp., and *Salvia* sp.	Unlikely. Few flowering plants present.
Eulachon *(Thaleichthys pacificus)*	FT/--	An anadromous fish typically known from the Mad River in northern California to the Nass River in British Columbia.	Unlikely. No suitable aquatic habitat present.
Foothill yellow-legged frog *(Rana boylii)*	FE/SE	Partly shaded, shallow streams and riffles with rocky substrate in a variety of habitats. Requires at least some cobble-sized substrate for egg-laying and 15 weeks of available water to attain metamorphosis.	Unlikely. No suitable aquatic habitat adjacent to project site.
Globose dune beetle *(Coelus globosus)*	--/--	Inhabitant of coastal sand dune habitat, erratically distributed from Ten Mile Creek in Mendocino County south to Ensenada, Mexico. Inhabits foredunes and sand hummocks. It burrows beneath the sand surface and is most common beneath dune vegetation.	Unlikely. No suitable coastal dune habitat.
Golden eagle *(Aquila chrysaetos)*	--/SFP	Rolling foothill mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range. Also uses large trees in open areas.	Unlikely. No suitable cliff walled canyons for nesting.
Hoary bat *(Lasiurus cinereus)*	--/SSC	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees. Feeds primarily on moths. Requires water.	Unlikely. No suitable water features adjacent to project site.
Least Bell's vireo *(Vireo bellii pusillus)*	FE/SE	Summer resident of southern and central California in riparian habitats below 2,000 feet in elevation. Often nests in large shrubs, along margins of bushes or on twigs projecting into pathways.	Unlikely. No suitable large shrubs on margins of riparian habitats.
Longfin smelt *(Spirinchus thaleichthys)*	FC/SE	Euryhaline, nektonic and anadromous fish found in open waters of estuaries, mostly in middle or bottom of water column. Prefers salinities of 15-30 ppt, but can be found in completely freshwater to almost pure seawater.	Unlikely. No suitable aquatic habitat within project area.

Exhibit J

Species	Status (Federal/State)	Suitable Habitat Description	Potential to Occur on Project Site
Marbled murrelet *(Brachyramphus marmoratus)*	FT/SE	Feeds near shore, and nests up to six miles inland from coast from Half Moon Bay to Santa Cruz in old-growth redwood forests, often in Douglas fir trees.	Unlikely. No suitable old-growth redwood forest present.
Monarch butterfly *(Danaus plexippus)*	FC/--	Winter roost sites. Wind protected tree groves (Eucalyptus, Monterey pine, cypress) with nectar and water sources nearby.	Unlikely. No eucalyptus, Monterey pine, or cypress within the project boundary.
Monterey hitch *(Lavinia exilicauda harengus)*	--/SSC	Inhabits slow warm water, including lakes and quiet stretches of rivers. Sometimes found in cool and clear low-gradient streams, hiding among aquatic vegetation in sandy runs or pools.	Unlikely. No suitable aquatic habitat.
Monterey shrew *(Sorex ornatus salarius)*	--/SSC	Riparian, wetland, and upland areas in the vicinity of the Salinas River delta. Prefers moist microhabitats. Feeds on insects and other invertebrates found under logs, rocks, and litter.	Unlikely. Outside of the vicinity of the Salina River delta.
Mount Hermon (=barbate) June beetle *(Polyphylla barbata)*	FE/--	Sand hills at Mount Hermon.	Unlikely. Not located in the Sand hills at Mount Hermon.
Northern California legless lizard *(Anniella pulchra)*	--/SSC	Sandy or loose loamy soils under sparse vegetation, moist soils. Anniella pulchra is traditionally split into two subspecies: *A. pulchra pulchra* (silvery legless lizard) and *A. pulchra nigra* (black legless lizard), but these subspecies are typically no longer recognized.	Unlikely. No suitable sandy soil on the project site.
Northwestern pond turtle *Actinemys marmorata)*	--/SSC	Associated with permanent or nearly permanent water in a wide variety of habitats. Requires basking sites. Nest sites may be found up to 0.5 km from water.	Unlikely. No suitable permanent water adjacent to project site.
Obscure bumble bee *(Bombus caliginosus)*	--/SCE	Meadows and grasslands with flowering plants. May be found in some natural areas within urban environments. Require flowering plants that bloom and provide adequate nectar and pollen throughout the colony's flight period from as early as February to late November.	Unlikely. Minimal flowering plants within the project site.
Ohlone tiger beetle *(Cicindela ohlone)*	FE/--	Remnant native grasslands in Santa Cruz County. Substrate is poorly drained clay or sandy clay soil over bedrock of Santa Cruz mudstone.	Unlikely. No suitable native grasslands.
Opler's longhorn moth *(Adela oplerella)*	FSC/--	From Marin county and the Oakland area on the inner coast ranges south to Santa Clara County. Serpentine grassland, larvae feed on *Platystemon californicus*).	Unlikely. No suitable serpentine grassland.
Pallid bat *(Antrozous pallidus)*	--/SSC	Deserts, grasslands, scrublands, woodlands, and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures.	Unlikely. No suitable rocky areas for roosting.
San Francisco dusky-footed woodrat *(Neotoma fuscipes annectens)*	--/SSC	Forest habitats of moderate canopy and moderate to dense understory. Constructs nest of shredded grass, leaves, and other materials.	Unlikely. No nests observed. Suitable tree groves.
San Francisco garter snake *(Thamnophis sirtalis tetrataenia)*	FE/SE, SFP	Typically found in the vicinity of freshwater marshes, ponds and slow-moving streams in San Mateo County and extreme northern Santa Cruz	Unlikely. Outside of the known range.

Table 2

Species	Status (Federal/State)	Suitable Habitat Description	Potential to Occur on Project Site
		County. Prefers dense cover and water depths of at least one foot. Upland areas near water are also very important.	
Santa Cruz black salamander *(Aneides flavipunctatus niger)*	--/SSC	Mixed deciduous and coniferous woodlands and coastal grasslands in San Mateo, Santa Cruz, and Santa Clara Counties. Adults found under rocks, talus, and damp woody debris.	Unlikely. No suitable mixed deciduous and coniferous woodlands or coastal grasslands.
Santa Cruz long-toed salamander *(Ambystoma macrodactylum croceum)*	FE/SE, SFP	Wet meadows near sea level in a few restricted locales in Santa Cruz and Monterey Counties. Aquatic larvae prefer shallow (<12 inches) water; use clumps of vegetation or debris for cover. Adults use mammal burrows.	Unlikely. No suitable wet meadows with shallow water and clumps of vegetation for breeding and larvae.
Short-eared owl *(Asio flammeus)*	--/SSC	(Nesting) Found in swamp lands, both fresh and salt; lowland meadows; irrigated alfalfa fields. Tule patches/tall grass needed for nesting/daytime seclusion. Nests on dry ground in depression concealed in vegetation.	Unlikely. No suitable swamp lands, meadows, or irrigated alfalfa fields with tule patches/tall grass for nesting.
Smith's blue butterfly *(Euphilotes enoptes smithi)*	FE/--	Coastal dunes and coastal sage scrub plant communities. Host plants include *Eriogonum latifolium* and *E. parvifolium* for larval and adult stages.	Unlikely. No host plants found onsite.
Steelhead *(Oncorhynchus mykiss irideus)*	FT/--	Coastal stream with clean spawning gravel. Requires cool water and pools. Needs migratory access between natal stream and ocean.	Unlikely. No suitable aquatic habitat.
Tidewater goby *(Eucyclogobius newberryi)*	FE/SSC	Brackish water habitats, found in shallow lagoons and lower stream reaches, still but not stagnant water with high oxygen levels.	Unlikely. No suitable aquatic habitat.
Townsend's big-eared bat *(Corynorhinus townsendii)*	--/SSC	Inhabits a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	Low probability. Marginal habitat. Suitable roosting sites.
Tricolored blackbird *(Agelaius tricolor)*	--/SE	Areas adjacent to open water with protected nesting substrate, which typically consists of dense, emergent freshwater marsh vegetation.	Unlikely. No suitable open water habitats with emergent vegetation present.
Western bumble bee (*Bombus occidentalis*)	--/CE	Meadows and grasslands with flowering plants; can also be found in natural areas within urban environments.	Unlikely. Limited grassland flowering plants. Surrounded by development, eucalyptus, and cemetery lawns.
Western snowy plover *(Charadrius alexandrinus nivosus)*	FT/SSC	Sandy beaches, salt pond levees, shores of large alkali lakes; sandy, gravelly, or friable soils for nesting.	Unlikely. No suitable sandy beaches.
White-tailed kite *(Elanus leucurus)*	--/SFP	Rolling foothills and valley margins with scattered oaks, and river bottomlands or marshes next to deciduous woodlands. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	Unlikely. No suitable grasslands or bottomlands nest to deciduous woodlands.
Yellow rail *(Corturnicops noveboracensis)*	--/SSC	Summer resident in eastern Sierra Nevadas, prefers freshwater marshlands.	Unlikely. No suitable freshwater marshes.
Yellow-billed cuckoo *(Coccyzus americanus)*	FT/SE	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.	Unlikely. No suitable riparian forest present.

Exhibit J

Species	Status (Federal/State)	Suitable Habitat Description	Potential to Occur on Project Site
Zayante band-winged grasshopper *(Trimerotropis infantilis)*	FE/--	Isolated sandstone deposits in the Santa Cruz Mountains, Zayante Hills ecosystem.	Unlikely. Outside of Zayante Hills ecosystem.

SOURCE: CDFW 2025, CNPS 2025

NOTE: Status Codes:

Federal (USFWS)

FE: Listed as Endangered under the Federal Endangered Species Act.

FT: Listed as Threatened under the Federal Endangered Species Act.

FC: A Candidate for listing as Threatened or Endangered under the Federal Endangered Species Act.

FSC: Species of Special Concern.

FD: Delisted under the Federal Endangered Species Act.

State (CDFW)

SE: Listed as Endangered under the California Endangered Species Act.

ST: Listed as Threatened under the California Endangered Species Act.

SR: Listed as Rare under the California Endangered Species Act.

SC: A Candidate for listing as Threatened or Endangered under the California Endangered Species Act.

SSC: Species of Special Concern.

SFP: Fully Protected species under the California Fish and Game Code.

SD: Delisted under the California Endangered Species Act.

DUDEK
725 FRONT STREET, SUITE 400
SANTA CRUZ, CALIFORNIA 95060
T 831.600.1400 F 831.600.1401

MEMORANDUM

To:	Sibley Simon, Sweet Developments LLC and Clay Toombs, Workbench
From:	Tara Johnson-Kelly (Dudek)
Subject:	Investigation of Vegetation Communities and Land Cover Types at 3500 Paul Sweet Road, Santa Cruz, California
Date:	September 12, 2025
cc:	Matt Ricketts and Stephanie Strelow, Dudek
Attachment(s):	A – Figure 1

1 Introduction

This technical memorandum (memo) summarizes the results of vegetation mapping performed at 3500 Paul Sweet Road (project site) in Santa Cruz, California, according to industry-standard methodologies (CDFW 2018, 2024). Dudek recommended this work after the County of Santa Cruz (County) requested additional information than provided in previous biotic assessments of the property (EMC 2025a, 2025b). Specifically, the County questioned the accuracy of previous conclusions that the site does not contain sensitive oak woodland habitat and requested additional "evaluation of potential oak woodlands [as defined in California Fish and Game Code § 1361(h)[1]] on the property to determine whether the project may result in a conversion of oak woodlands that will have a significant effect on the environment pursuant to § 21083.4" under the California Environmental Quality Act (CEQA) (County of Santa Cruz 2025). This memo aims to provide this information.

The project site is located on Paul Sweet Road between Chaminade Lane and Plateau Drive in the City of Santa Cruz, California. The property gently slopes from east to west and ranges in elevation from 140 feet above mean sea level at the northeastern corner to 117 feet above mean sea level at the southwest corner. Existing structures on the project site include a single-family residence in the center of the property and two sheds near the northwest corner of the lot. Surrounding land use includes the Dominican Oaks retirement community to the east, Chaminade Resort and Spa to the north, Oakwood Memorial Park and Cemetery to the west, and Dominican Hospital to the south.

2 Methods

Dudek biologist Tara Johnson-Kelly mapped vegetation on the project site from 12:25 pm to 2:00 pm on August 27, 2025. Mapping followed the guidelines outlined in CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018) and *Survey of California*

[1] "Oak woodlands" means an oak stand with a greater than 10 percent canopy cover or that may have historically supported greater than 10 percent canopy cover.

Vegetation Classification and Mapping Standards (CDFW 2024). The purpose of the mapping was to document existing vegetation communities and land cover types, including any communities designated as sensitive on CDFW's *California Natural Community List* (CDFW 2025).

CDFW's Vegetation Classification and Mapping Program (VegCAMP) works to classify and map the vegetation of California and determine the rarity of vegetation types. Current classification of vegetation in California follows the National Vegetation Classification Standard (NCVS) focuses on mapping vegetation communities at the two lowest levels of the NVCS hierarchy: associations and alliances. Associations are the most granular level and are grouped into alliances. Alliances or associations with a state rarity ranking of S1 through S3 on CDFW's Natural Community list (CDFW 2025) are designated as *sensitive natural communities* and considered highly imperiled. Project impacts on high-quality occurrences of these communities are typically considered significant under CEQA. In contrast, impacts on degraded occurrences of these communities (e.g., dominated by nonnative invasive species, subject to high levels of human or animal disturbance) may be determined to be less than significant.

3 Results

Two vegetation communities and two land cover types were observed on the project site. The below descriptions of these communities are adapted from A Manual of California Vegetation Online (CNPS 2025). The locations of these communities are depicted in Attachment A (Figure 1).

Coast Live Oak Woodland

In the coast live oak (*Quercus agrifolia*) woodland alliance, coast live oak is typically dominant or co-dominant in the tree canopy with bigleaf maple (*Acer macrophyllum)*, Pacific madrone (*Arbutus menziesii)*, southern California black walnut (*Juglans californica)*, blue oak (*Quercus douglasii)*, Engelmann oak (*Quercus engelmannii)*, valley oak (*Quercus lobata)* and California bay-laurel (*Umbellularia californica)*. This community has an open to continuous or savanna-like canopy less than 30 meters tall, and coast live oak comprises more than 50% relative cover. The shrub layer is sparse to intermittent, and the herbaceous layer is sparse or grassy (CNPS 2025).

On the north side of the project site bordering the Dominican Oaks property, the coast live oak woodland understory has been managed for wildfire protection and is completely devoid of a shrub or herbaceous layer up to the project's property line. On the west side of the site along Paul Sweet Road up to the Dominican Oaks property line, the oak woodland community has an intermittent shrub layer and grassy herbaceous layer. This section of the woodland contained sparse California bay-laurel saplings, small poison oak (*Toxicodendron diversilobum*) and California blackberry (*Rubus ursinus*) shrubs, French broom (*Genista monspessulana*), and ornamental belladonna lilies (*Amaryllis belladonna*). Wild turkeys (*Meleagris gallopavo*) and coast range fence lizards (*Sceloporus occidentalis bocourtii*) were observed foraging within this vegetation community. The coast live oak woodland alliance has a state Rarity Rank of S4 and is not considered a sensitive natural community by CDFW (CDFW 2025), although some associations of this alliance (e.g., coast live oak – California bay woodland) do meet the definition of sensitive (i.e., have a Rarity Rank of S3 or lower). No sensitive associations of the coast live oak woodland alliance were observed on the site. In the project site, this vegetation community comprises 0.11 acres.

Annual Grassland

The annual grassland community (aka. wild oats and annual brome [*Avena* spp. – *Bromus* spp.] grassland semi-natural alliance) includes wild oats (*Avena* spp.), purple false brome (*Brachypodium distachyon*), big quaking grass (*Briza maxima*), bromes (*Bromus* spp.), and/or hare barley (*Hordeum murinum*) as the dominant or co-dominant species, with other non-natives in the herbaceous layer such as Australian saltbush (*Atriplex semibaccata*) and other *Hordeum* species. Emergent trees and shrubs may be present at low cover. Cover is open to continuous and less than 4 feet in height (CNPS 2025).

Annual grassland occurs throughout the project site surrounding the existing structures. This vegetation community is degraded, with several species of non-native plants such as horseweed (*Erigeron canadensis*), Jersey cudweed (*Pseudognaphalium luteoalbum*), and Italian thistle (*Carduus pycnocephalus*) growing over what was once a gravel driveway and piles of dirt. Numerous Botta's pocket gopher (*Thomomys bottae*) burrows were observed within this community. Annual grassland is not considered a sensitive natural community by CDFW (2025). In the project site this vegetation community comprises 0.37 acres.

Ornamental Plantings

The ornamental plantings land cover consists of a variety of native and non-native plants that were intentionally planted as landscaping. In the project site, ornamental plantings are a mix of native and non-native species including hollyleaf cherry (*Prunus ilicifolia*), white poplar (*Populus alba*), Peruvian pepper tree (*Schinus molle*), silver wattle (*Acacia dealbata*), carob tree (*Ceratonia siliqua*), quince (*Cydonia oblonga*), Indian fig opuntia (*Opuntia ficus-indica*), tree aeonium (Aeonium arboreum), and baby sage (*Salvia microphylla*) This land cover was found along the east and south border of the project site. In the project site, this land cover type comprises 0.08 acres.

Urban/Developed

Urban land cover refers to areas that have been constructed on or otherwise physically altered to the point where vegetation is no longer present. Urban or developed areas are characterized by permanent or semi-permanent structures, hardscapes, and landscaped areas. Within the project site, the urban land cover consists of existing buildings. This land cover primarily supports ruderal or landscaped vegetation where present. In the project site, this land cover comprises 0.04 acres.

4 Discussion and Conclusions

In its tree report for the project, Aesculus Arboricultural Consulting (2025) concluded that the on-site oak woodland—which is 0.4 acre (0.16 hectare [ha]) in size—does not meet the United States Department of Agriculture (USDA) Forest Service's classification of a forest 1 acre (0.4 ha) in size and 120 feet (36.6 m) wide measured stem-to-stem from the outermost edge. Using this forestry-based definition, we concur that the on-site woodland would not qualify as an oak woodland forest stand. However, this definition is not typically applied within the context of evaluating biological resource impacts under CEQA. Instead, impacts on oak woodlands are typically based on whether the affected oak woodland community is considered sensitive by CDFW (2025) and if so, if it represents a high-quality occurrence of the community.

Other state regulations address oak woodlands. As cited by the County in its information request, section 1361(h) of the California Fish and Game Code defines an oak woodland as an "oak stand with greater than 10% canopy cover," Section 21083.4 of the California Public Resources Code (PRC) also requires that, as part of determining whether an environmental impact report, a negative declaration, or a mitigated negative declaration shall be required for any project (section 21081.1 PRC), a county shall determine whether a project within its jurisdiction may result in a conversion of oak woodlands that will have a significant effect on the environment.

The on-site coast live oak woodland is part of a grove that meets the definition of an oak woodland under § 1361(h) of the California Fish and Game Code (i.e., it has greater than 10% canopy cover), but does not meet the vegetation criteria for classification as sensitive on the *California Natural Community List* (CDFW 2025) (i.e., it does not belong to one of the 10 sensitive associations under the coast live oak woodland and forest alliance). In addition, the degraded condition of the woodland (i.e., understory vegetation removed for fire protection, presence of invasive species such as French broom) reduces its habitat value. Therefore, it is our opinion that the stand of oak woodland that overlaps the project site is not a high-quality occurrence of this community, nor is it considered a sensitive natural community by CDFW. Although the project would involve removal or trimming of existing coast live oaks, we believe this would be a less-than significant-impact under CEQA because of the low habitat quality of the oak woodland. It is surrounded by development and contains many invasive species. The project would not result in a conversion of oak woodlands that will have a significant effect on the environment.

Please contact me at tjohnson-kelly@dudek.com if you have any questions or require additional information.

Sincerely,

Tara Johnson-Kelly

Tara Johnson-Kelly
Biologist

Att.: Attachment A, Figure 1

References

Aesculus Arboricultural Consulting. 2025. Tree Report for Proposed Site Development at 3500 Paul Sweet Rd, Santa Cruz, CA 95065. September 11, 2025.

CDFW (California Department of Fish and Wildlife). 2018. "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant populations and Sensitive Natural Communities." March 20, 2018. Accessed August 27, 2025. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline

CDFW. 2024. "Survey of California Vegetation Classification and Mapping Standards." March 6, 2024. Accessed August 27, 2025. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=102342&inline

CDFW. 2025. "California Natural Community List." February 27, 2025. Accessed August 27, 2025. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153398&inline

CNPS (California Native Plant Society). 2025. A Manual of California Vegetation, Online Edition. Sacramento, California: CNPS. Accessed August 2025. https://vegetation.cnps.org.

County of Santa Cruz. 2025. "3500 Paul Sweet Road Biotic Review Request for Additional Information." Letter from Juliette Robinson (County of Santa Cruz) to Clay Toombs (Workbench). June 13, 2025.

EMC (EMC Planning Group, Inc.). 2025a. "Biotic Report: 3500 Paul Sweet Rd., Santa Cruz County" Prepared for Workbench (Clay Tombs). Monterey, California: EMC. February 25, 2025 (revised March 4, 2025).

EMC. 2025b. "Evaluation of Potential Oak Woodland: 3500 Paul Sweet Rd., Santa Cruz County. Prepared for Workbench (Clay Tombs). Monterey, California: EMC. March 4, 2025.

Attachment A
Figure 1

SOURCE:

FIGURE 1

Vegetation Map

Paul Sweet Rd Bio

DUDEK

0 15 30 Feet

Exhibit J

County of Santa Cruz

Department of Community Development and Infrastructure
701 Ocean Street, Fourth Floor, Santa Cruz, CA 95060
Planning (831) 454-2580 Public Works (831) 454-2160
sccoplanning.com dpw.co.santa-cruz.ca.us

4 April 2025

Sweet Developments LLC
c/o Workbench
Attn: Tim Gordin <tim@workbenchbuilt.com>
189 Walnut Avenue
Santa Cruz, CA 95060

Subject: Review of the Geotechnical Investigation, Proposed Mixed-Use Building, 3500 Paul Sweet Road, Santa Cruz, CA/APN 025-013-37 report dated 2 May 2023 by Rock Solid Engineering, Inc. - Project No. 23016

Project Site: 3500 Paul Sweet Road, Santa Cruz
APN 025-013-37
Application Nos.: REV251036/241360

Dear Applicant:

The Planning Division has accepted the subject geotechnical investigation report for the proposed project. The following items shall be required:

1. All project design and construction shall comply with the recommendations of the subject geotechnical investigation report.

2. After plans are prepared that are acceptable to all reviewing agencies, please submit a completed Soils (Geotechnical) Engineer Plan Review Form to Environmental Planning. The Consultants Plan Review Form (Form PLG-300) is available on the Planning Division's web page. The author of the soils reports shall sign and stamp the completed form. Please note that the plan review form must reference the final plan set by the last revision date.

Electronic copies of all forms required to be completed by the Geotechnical Engineer may be found on our website: Assistance and Forms (santacruzcountyca.gov)

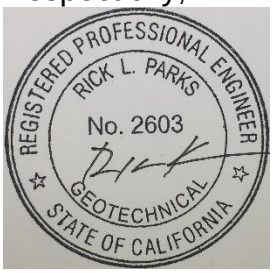
After building permit issuance the soils engineer *must remain involved with the project* during construction. Please review the Notice to Permits Holders (attached).

Exhibit K

Our acceptance of the report is limited to its technical content. Other project issues such as zoning, fire safety, septic, or sewer approval, etc. may require resolution by other agencies.

If we may be of any further assistance, please contact the undersigned at: 831.454.3168 or rick.parks@santacruzcounty.us

Respectfully,



Rick Parks, GE 2603
Civil Engineer – Environmental Planning
County of Santa Cruz CDI

Cc: Environmental Planning, Attn: Leah MacCarter
Rock Solid Engineering, Inc., Attn: Yvette Wilson, PE

Attachments: Notice to Permit Holders

Exhibit K

NOTICE TO PERMIT HOLDERS WHEN A SOILS REPORT HAS BEEN PREPARED, REVIEWED AND ACCEPTED FOR THE PROJECT

After issuance of the building permit, the County requires your soils engineer to be involved during construction. Several letters or reports are required to be submitted to the County at various times during construction. They are as follows:

1. **When a project has engineered fills and/or grading**, a letter from your soils engineer must be submitted to the Environmental Planning section of the Planning Department prior to foundations being excavated. This letter must state that the grading has been completed in conformance with the recommendations of the soils report. Compaction reports or a summary thereof must be submitted.

2. **Prior to placing concrete for foundations**, a letter from the soils engineer must be submitted to the building inspector and to Environmental Planning stating that the soils engineer has observed the foundation excavation and that it meets the recommendations of the soils report.

3. **At the completion of construction,** a *Soils (Geotechnical) Engineer Final Inspection Form* from your soils engineer is required to be submitted to Environmental Planning that includes copies of all observations and the tests the soils engineer has made during construction and is stamped and signed, certifying that the project was constructed in conformance with the recommendations of the soils report.

   If the *Final Inspection Form* identifies any portions of the project that were not observed by the soils engineer, you may be required to perform destructive testing in order for your permit to obtain a final inspection. The soils engineer then must complete and initial an *Exceptions Addendum Form* that certifies that the features not observed will not pose a life safety risk to occupants.

Exhibit K

Central Fire District of Santa Cruz County
COMMUNITY RISK REDUCTION DIVISION
930 17th Avenue Santa Cruz Ca 95062
(831) 685-6698

Date: 12/22/25

Owner: Sweet Developments LLC.
Mailing Address: 189 Walnut Ave, Santa Cruz, CA
Applicant: Clay Toombs for Workbench
From: Central Fire District of Santa Cruz County

Project Address: 3500 Paul Sweet Road, Santa Cruz, CA
Subject: New 105-unit Multi-Family Housing Development (Planning/Discretionary Review)
APN: 025-013-37
Permit/Eplan: Disc. 241360 (PC3)

Based upon review of the plans submitted, District requirements appear to have been met and the *Discretionary review is complete*.

As a reminder, please ensure designer/architect reflects the following equivalent notes and requirements on velums as appropriate when submitting for **Application for Building Permit.**

The amount due for this plan review is $115.00. A $75.00 late fee may be added to your plan check fees if payment is not received within **30 days** of the date on the corresponding invoice.

To pay online, please visit our District website at centralfiresc.org "Make a Payment" (APN is required). Otherwise, check payment shall be made payable to *Central Fire District* and either dropped off or mailed to the address below.

Community Risk Reduction
930 17th Avenue Santa Cruz, CA 95062

Should you have any questions regarding the plan check comments, please email me at ahyatt@interwestgrp.com . All other inquiries may be directed at Central Fire District's Community Risk Reduction Division at (831) 685-6698.

CC: File & County

As plans and details comply with applicable Specifications, Standards, Codes and Ordinances, agree that they are solely responsible for compliance with applicable Specifications, Standards, Codes and Ordinances and further agree to correct any deficiencies noted by this review, subsequent review, inspection or other source. Further, the submitter, designer, and installer agree to hold harmless from all alleged claims to have arisen from any compliance deficiencies, without prejudice, the reviewer and reviewing agency.

Exhibit L

Date: **February 28, 2025**

To: **Jonathan DiSalvo**

Senior Planner
County of Santa Cruz
Community Development & Infrastructure
701 Ocean St., Room 400
Santa Cruz, CA 95060
jonathan.disalvo@santacruzcountyca.gov
(831) 454-3157

RE: **App # 241360 (3500 Paul Sweet) - LORI item "Results of Neighborhood Meeting" - Community Meeting Summary**

Dear Jonathan,

A neighborhood meeting was conducted via Zoom on February 25, 2025 for Application # 241360 (3500 Paul Sweet Rd). The project was presented, then a live Q&A was conducted, with all participants being given the opportunity to speak. Four attendees (other than the Applicant's team) spoke: Amy, a representative from the management of the Dominican Oaks retirement community immediately adjacent to the property; Rachel, a representative of Dominican Hospital; and Kent and Lou, neighbors of the Project. The Applicant is working with Amy and Rachel to schedule a follow-up meeting with Dominican Oaks and Dominican Hospital. Subsequent to the meeting, Lou requested a link to a video of the meeting, which was provided to him via email.

Here is a link to the video recording of the meeting: App#241360 Community Mtg 250225.mp4

Zoom AI-created Summary of the Meeting

Meeting Summary for 3500 Paul Sweet Rd. - Community Meeting
Feb 25, 2025 06:39 PM Pacific Time (US and Canada) ID: 823 8122 4179

Quick recap

The attendees discussed the setup of their online meeting, including the use of a Zoom Business account, participant management, note-taking methods, and a transcription feature. The team also reviewed a housing project overview, a project located at 3,500 Paul Sweet Road, and potential impacts of a new residential development on the local community. Concerns were raised about traffic, parking, safety, and access to the project's drawings and plans, which will be further discussed in a separate meeting.

Next steps

Tim/Workbench to set up a site walk with Rachel and Amy to discuss traffic and safety concerns.
Tim/Workbench to explore options for increasing parking spaces beyond the current 75 spots.
Workbench to investigate implementing additional security measures for the completed project.
Workbench to conduct a sewer camera inspection of the old sewer line on the property that appears to connect to Dominican Hospital's property.
Workbench to provide the recording of the meeting to Jonathan Desalvo at the county planning department for public access.
Workbench to update project plans to reflect the change from 12 affordable units to 6 extremely low income units.

workbench

189 WALNUT AVE.
SANTA CRUZ CA 95060
831.227.2217
WORKBENCHBUILT.COM

Exhibit M

Workbench to continue discussions with Dominican Hospital representatives regarding utility impacts and infrastructure concerns.

Summary

Online Meeting Setup and QA Discussion

In the meeting, Tim, Jessica, and Clay discussed the setup of their online meeting. They decided to use a Zoom Business account for QA, with Jessica controlling the slide deck. Jessica attempted to add Zoom panelists but found it was a fee. They decided to manage QA by having participants raise their hands. For note-taking, they planned to either use AI or have Clay take notes. They also enabled a transcription feature for potential note-taking. The meeting was recorded for future reference.

Workbench Paul Suite Community Meeting Begins

At the meeting, Tim Gordon, an owner and co-founder of Workbench, started the Paul Suite Community meeting. Despite some attendees arriving late, the meeting proceeded as planned. Jessica was instructed to let the latecomers in, and the attendees were given time to join and participate in the discussion.

Addressing Housing Crisis in Santa Cruz

Tim presented a housing project overview, highlighting the state's housing crisis and Santa Cruz County's involvement in addressing it. He discussed the project's location, team members, and company history. Tim emphasized the urgency of the housing crisis, citing statistics on housing supply and affordability. He explained the state's approach to combating the issue through legislation and the county's goals for infill development. The project aims to create 105 new homes in Santa Cruz.

Workbench Project Overview and Solutions

Jessica Presley, a project manager at Workbench, presented an overview of a project located at 3,500 Paul Suite Road. The project, which is zoned for office and residential use, proposes 105 units with a mix of studio, junior one-bedroom, and one-bedroom units. The development will be fully electric, with EV charging, photovoltaics, and a focus on sustainable and healthy material selection. The project will be built using modular construction, and it will include 12 designated affordable units. The site is well-connected to public transportation and major highways, and it is surrounded by open spaces, single-family and multifamily residences, medical facilities, and offices. Jessica also discussed the traffic and parking concerns in the neighborhood and presented a thoughtful solution that balances the needs of the development with the surrounding area's infrastructure. The project will include 22 car spaces, 6 EV charging stations, and ample bike parking. The site's central location near key transportation routes positions it as an ideal hub for multimodal transportation.

Dominican Oaks Building Proposal Concerns

In the meeting, Amy, the executive director of Dominican Oaks, raised concerns about the proposed 6-story building's proximity to her property and its potential impact on traffic and parking. Tim confirmed that the 6-story proposal was not yet approved but was being considered. He also mentioned that the construction would be modular and anticipated to start next year, with a construction timeline of 14 to 16 months. Tim acknowledged Amy's concerns about traffic and parking, and suggested a future walk-through to better understand the challenges. Amy also inquired about post-construction security measures, to which Tim confirmed the presence of an on-site security system, cameras, and an on-site manager.

Residential Development's Community and Infrastructure Impact

In the meeting, Amy, Tim, Jessica, Rachel, Kent, Clay, and Lou discussed the potential impacts of a new residential development on the local community. Rachel, a Vice President for Dominican Hospital, expressed concerns about traffic, parking, and safety, particularly for emergency vehicles and senior citizens. Clay confirmed that utility studies have been conducted and that there is sufficient power and water supply for the project. Rachel also raised concerns about waste water and gas utilities, which Clay assured would be investigated. Lou asked about accessing the meeting recording, which Tim confirmed would be provided to the planning department. Jessica inquired about the process of making the project's drawings and plans accessible to the community, to which Tim suggested reaching out to Jonathan Desalvo at the county. The team agreed to further discuss these concerns in a separate meeting.

Closing

We trust the above summary and link to the video of the meeting satisfy the requirements for the LORI item “Results of Neighborhood Meeting.”

Sincerely,

Clay Toombs
Sr. Development Mgr.
o. 831.227.2217 ext. 310
c. 323.363.0257
clay@workbenchbuilt.com

workbench

Jonathan DiSalvo

From: Rachel Howley CA-Santa Cruz <rachel.howley@commonspirit.org>
Sent: Thursday, December 4, 2025 3:04 PM
To: Jonathan DiSalvo; Natalie Kirkish; s.pavonetti@gmail.com; jessenickell3art@gmail.com; Trina Barton; yeseniajduran@gmail.com; renee@reneesgarden.com
Subject: 3500 Development Concerns
Attachments: Paul Sweet Development Project Concerns.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Dear Santa Cruz County Planning Commissioners,

I am writing to respectfully bring your attention to the recently submitted letter from Mr. Chip Bogaard regarding the proposed development at 3500 Paul Sweet Road, adjacent to Dominican Hospital and Dominican Oaks. His analysis raises several critical life-safety and infrastructure concerns that deserve careful consideration before any approvals move forward.

Dominican Hospital and Dominican Oaks serve as essential pillars of the Santa Cruz community, providing acute-care services, long-term support, and a safe living environment for some of our most vulnerable residents. Any development in close proximity to these facilities must be designed with the highest standards of safety, compatibility, and operational independence.

Mr. Bogaard identifies several key issues in the current proposal:

- **Emergency access and egress risks**, including fire-apparatus staging that would block Dominican Oaks' only driveway—compromising evacuation capability for seniors with mobility limitations.
- **Intended use of Dominican Oaks' private fire hydrant and water system**, which poses unresolved engineering and operational risks and could impact fire-flow availability for the facility.
- **Severe fire-exposure concerns** due to the proposed 82-foot structure being only five feet from the property line, creating significant radiant-heat, debris, and evacuation hazards.
- **A building mass vastly out of scale** with the surrounding healthcare and senior-living environment, directly affecting safety, emergency response, and neighborhood character.
- **Inappropriate reliance on Dominican Oaks' private property and infrastructure**, which the facility is not obligated—and cannot safely be expected—to support.

As Mr. Bogaard notes, this is not an opposition to development itself. Rather, it is a call for a responsibly designed project that protects current residents, aligns with local infrastructure capacity, and maintains the safety and operational integrity of Dominican Hospital and Dominican Oaks.

Exhibit N

These facilities play an irreplaceable role in the well-being of Santa Cruz County. Protecting their ability to operate safely—especially during emergencies—must remain a top priority.

Thank you for your thoughtful review of these concerns.

Sincerely,

--

Rachel Howley

VP, Ancillary Services

Dignity Health
Dominican Hospital
1555 Soquel Drive

Santa Cruz, CA 95065
831.462.7336 (O) 561-721-5769 (C)

Rachel.Howley@commonspirit.org

Caution: This email is both proprietary and confidential, and not intended for transmission to or receipt by any unauthorized persons. If you believe that it has been received by you in error, do not read any attachments. Instead, kindly reply to the sender stating that you have received the message in error. Then destroy it and any attachments. Thank you.

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BOGARD CONSTRUCTION, INC.
Since 1947

December 4, 2025
Dominican Oaks Adjacent Property Development

Dear Rachel,

We have reviewed the design development drawings for the proposed residential project at 3500 Paul Sweet Road (APN 02501337), with particular attention to life-safety concerns affecting both Dominican Hospital and Dominican Oaks. Based on the drawings, I have identified several significant issues with the project as currently proposed.

1. Emergency Access and Egress Concerns: The proposed locations for fire-apparatus staging, both positioned on Dominican Oaks property, would completely block the private driveway serving the facility. In an emergency—particularly a fire originating in the adjacent new building—this blockage would prevent or severely impede the evacuation of Dominican Oaks residents, who require dependable, unobstructed egress because of their age and mobility needs.

2. Proposed Use of the Dominican Oaks Private Fire Hydrant: The drawings appear to indicate that the developer intends to rely on the Dominican Oaks private fire hydrant during fire department operations. This hydrant is supplied by a private fire water system supported by a booster pump, which was designed specifically for Dominican Oaks. Additional engineering analysis is necessary to determine:

- Whether simultaneous use by the proposed development could compromise fire flow availability for Dominican Oaks, and
- Whether the water system can safely accommodate external demand without affecting its primary function.

Until this analysis is completed, the proposed hydrant use presents an unresolved and potentially serious risk.

3. Exterior Fire Exposure Due to Extremely Close Proximity: The proposed 82-foot-tall, 106-unit building is planned at approximately five feet from the Dominican Oaks property line. For a building of this height and density, such minimal spacing creates a meaningful exterior fire-exposure risk. A fire in the new building could expose Dominican Oaks to:

- High levels of radiant heat,
- Wind-carried burning debris, and
- Increased complexity in evacuating a vulnerable population.

Best practices in the fire-protection field generally recommend substantially greater separation distances between multi-story structures, or—where distance is not feasible—the incorporation of enhanced fire-rated construction and protection features. Further evaluation by qualified fire-protection engineers is strongly recommended, particularly with a building of this magnitude.

BOGARD CONSTRUCTION, INC.
Since 1947

4. A Building Mass Out of Scale With the Neighborhood Context: Beyond the measurable life-safety concerns, the proposed structure is significantly out of scale with the surrounding neighborhood. The Paul Sweet Road corridor is characterized by low-rise, low-density buildings that serve healthcare facilities, residents, and senior-living communities in a quiet and intentionally moderated environment. In contrast, the proposed tower—on a very constrained quarter-acre parcel—introduces a building mass and height that are disproportionate and inconsistent with the character of the area. This is not merely an aesthetic issue; the outsized scale directly contributes to intensified fire-exposure risk, evacuation challenges, and emergency-response complications for Dominican Oaks.

5. Reliance on Dominican Oaks' Property and Infrastructure: The current proposal depends on Dominican Oaks property for fire-truck staging and fire-protection water supply—neither of which Dominican Oaks is obligated to support. Senior-living facilities must preserve independence in their emergency-response planning, and the current design places an undue operational burden on Dominican Oaks.

6. Additional Considerations: Other aspects - including potential traffic impacts, environmental review requirements, and infrastructure constraints - will likely require further evaluation by the appropriate specialists.

To be clear, this assessment does not oppose a development of some kind. A well-designed project could benefit the community and, if properly planned, coexist successfully with Dominican Hospital and Dominican Oaks.

However, as currently proposed, the project presents significant life-safety concerns, relies improperly on Dominican Oaks infrastructure, and is not compatible with the existing neighborhood scale or with the operational needs of a senior-housing facility.

A mutually beneficial outcome is achievable, but only if the development team is willing to revise the project to comply fully with applicable fire and building code requirements, ensure unobstructed emergency egress for Dominican Oaks, operate independently of Dominican Oaks' private fire-protection systems, and reduce the exposure risks associated with building height and minimal setbacks. I would be glad to continue the discussion or assist in evaluating revised proposals that better protect Dominican Hospital and Dominican Oaks while still enabling responsible use of the site.

Sincerely,

Chip Bogaard
Bogard Construction, Inc.

Jonathan DiSalvo

From: Virginia Lieb <virginia@lieb.com>
Sent: Sunday, November 30, 2025 9:55 AM
To: Jonathan DiSalvo
Cc: Manu Koenig
Subject: 3500 Paul Sweet rd project protected under CEQA

Follow Up Flag: Follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Hello Mr. DiSalvo

I am concerned that the Planning Committee may believe that "Sweet Homes at 3500 Paul Sweet Road can be exempt from the California Environmental Quality Act (CEQA) and will not take into consideration that Dominican Oaks is a sensitive receptor location. Environmental impact assessments under the CEQA must analyze potential air quality, noise, and visual impacts on nearby "**sensitive receptors".** Sensitive receptor locations include

- Hospitals and healthcare facilities: These locations house individuals with pre-existing health conditions and are therefore highly sensitive to environmental factors.
- Nursing and retirement homes: Facilities housing the elderly, who are more susceptible to pollution and other environmental hazards.

Supervisor Manu Koenig, In his written statement prior to the November 14 Board of Supervisors meeting about battery storage locations being considered, stated "The transformer behind Dominican Hospital [that is also behind Dominican Oaks] is off the table because of so many health care facilities and vulnerable people"

If a battery storage facility is not safe next to Dominican Oaks, why should an apartment building be approved that poses huge safety risks and life threatening danger to vulnerable elderly people?

I believe Dominican Oaks is eligible for CEQA protections.

Thank you for your time and consideration on this matter.

Virginia Lieb

Exhibit N

Jonathan DiSalvo

From: Virginia Lieb <virginia@lieb.com>
Sent: Sunday, November 30, 2025 9:55 AM
To: Jonathan DiSalvo
Cc: Manu Koenig
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Thank you for your time and consideration on this matter.

Virginia Lieb

Exhibit N

Affordable Housing NOW!
(760-935-4892)
Every Unit Counts!

Santa Cruz County Planning Commission

Dear Planning Commission Members,

Affordable Housing NOW endorses the Workbench Paul Sweet Road project.

The project is the first market-rate development to provide units in the Extremely Low-Income category. That would be a subsidy far more than double what a moderate-rate unit would be.

This project is an opportunity site in an area of the county that might qualify for the Affirmatively Furthering Fair Housing. This requirement in the Housing Element is an important goal for the County but is especially important for the residents of this project.

While the number of affordable units is small, as our motto states, "every unit counts." The County RHNA goal for the 2023 cycle of 1,492 in the very low-income category is daunting.

The market-rate units of this project address the county's need for more smaller housing units. Many areas of the county have mostly large two or more-bedroom units. The Paul Sweet Road project provides many, much needed, studio and one-bedroom units.

Affordable Housing NOW encourages the Commission to move this important project forward.

Sincerely,

Tim Willoughby- chair

Exhibit N

HOUSING
SANTA CRUZ COUNTY
PO Box 1460, Santa Cruz, CA 95061
www.housingsantacruzcounty.com

Housing Santa Cruz County (HSCC) is proud to endorse the 3500 Paul Sweet Road project, an innovative and thoughtfully designed development that addresses the county's urgent housing needs.

This project marks a historic first: the inclusion of six units dedicated to Extremely Low-Income (ELI) households, the largest per-unit rental subsidy we have seen in any local project to date. These homes represent a profound and commendable commitment to serving our county's most vulnerable residents, who are often overlooked in today's housing market.

Of the 105 homes proposed, 90 are market-rate units that are intentionally modest in size, making them more attainable in one of the most expensive and exclusive areas of the county, where single-family homes dominate the landscape. This approach creates a rare opportunity for diverse residents to live affordably in a high-opportunity neighborhood.

The project also features several thoughtful amenities, including a landscaped terrace and lounge for residents, EV charging stations, and approximately 150 bicycle parking spaces.

This project demonstrates responsible planning, environmental sensitivity, and a clear commitment to affordability. HSCC strongly urges our county leaders to support and advance this important development.

Sincerely,

Elaine Johnson

Elaine Johnson
Executive Director

Exhibit N

Jonathan DiSalvo

From: Topsy Smalley <topsyneher@gmail.com>
Sent: Tuesday, December 30, 2025 1:36 PM
To: Jonathan DiSalvo
Subject: 3500 Paul Sweet Rd
Attachments: DanKriege20251230DiSalvo.docx

Follow Up Flag: Follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

December 30, 2025

Dear Jonathan DiSalvo:

My name is Dan Kriege.

I am a registered civil engineer. I live at Dominican Oaks in Santa Cruz.

As part of my career, I was responsible for a large portion of the water supply for Silicon Valley. I was a Board member for forty years on the Soquel Creek Water district. And I was appointed by the Governor to the California Water Commission.

Today, we are dealing with a proposed huge 82-foot-high building on a very small lot. To develop this project the builder must remove some 10,000 cubic yards of dirt and rock. This property is surrounded on three sides by Dominican Oaks.

In my opinion, construction will require shoring of drilling holes 8 feet on center around the three sides. On the south side there will be a 22-foot-high wall. The drill rig will hit bedrock at about 15 feet. This bedrock extends the width of the project in addition to about 50 feet south. This drilling of some estimated 8,000 square feet of bedrock will require Ram-hole type bedrock breaking equipment designed for bedrock. Bedrock breaking along with loading of bedrock into 10-wheel diesel dump trucks will create sounds over 100 decibels. This work will continue for several weeks.

At the same time, on the same site, there will possibly be several bulldozers pushing dirt for a frontend loader that is loading another 10 wheel diesel dump truck for another two months of dirt removal followed by a year or so of building. Hammers, nail guns, large cranes and assorted noise emitters will add to the sounds.

The noise is a given.

There is now a 3-story building with 30 apartments about 60 feet from what will be the extreme 70 to over 100 decibel noise levels. An additional 170 residents live within 100 feet.

Exhibit N

Regardless of any offer, you are not going to move out over two hundred 80-, 90-, 100-year-old residents.

My sister, who lives next to me, is 100 years old. She gets to meals, activities, and movies with her walker. You think you can move her and many just like her, to a hotel with Dennys down the street? There would be chaos.

Be advised: Dominican Oaks residents are defined as “sensitive receptors.”

Sincerely,

Daniel F. Kriege

Kriege7@gmail.com

--
Topsy Neher Smalley
Research Librarian
Santa Cruz, CA 95065 USA
Help for Researchers http://topsyneher.org
(831) 464-3354

Exhibit N

Jonathan DiSalvo

From: john weiser <jwweiser@gmail.com>
Sent: Wednesday, December 10, 2025 11:15 AM
To: Jonathan DiSalvo
Subject: 3500 Paul Sweet Rd.

Follow Up Flag: Flag for follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Dear Mr. DiSalvo,
I know this is a particularly busy time for you, but I wanted to be sure you were aware of a central point in the Workbench application for the project at 3500 Paul Sweet Rd., a point which Workbench has understandably not raised, because it blows a hole in their case. The point is the major exception which the state

Exhibit N

put in the Builder's Remedy legislation. The state wisely left in the hands of the local authorities safety and health considerations. Safety and health considerations pose a serious hurdle for Workbench.
Consider first the intersection of Soquel and Paul Sweet Rd. That intersection serves two entrances and two exits to Highway 1. It also serves the through traffic of Soquel, which is stop and go north in the morning and stop and go south in the afternoon. It is also the intersection that serves Dominican Hospital and the

Exhibit N

ambulances that have to rush out to pick up and return patients. To all this, Workbench now proposes to add 100 families, almost all of whom will have cars and will need to use the same intersection to go to work, to drive children to school (there are no school buses for general education), to go shopping, etc. I hesitate to think what will happen during the construction period when many workers arrive each morning and leave each afternoon and many vendors deliver supplies. All of these traffic burdens add to the

Exhibit N

challenge for ambulances to rush out to do their job. This intersection is also the critical point if there is an emergency somewhere on Paul Sweet Rd. or a need to evacuate in case of fire, etc. It seems to me to qualify as a safety concern to be carefully considered in determining whether to approve this project.

Another safety concern is the forest of eucalyptus trees on Chaminade property abutting the site of the proposed 3500 project. If those trees began to burn, evacuation of 3500 would be

Exhibit N

needed, hopefully before the building caught fire and then evacuation of neighboring Dominican Oaks would be needed, a real challenge because so many of the Dominican Oaks residents are handicapped and because the fire fighting diagram for 3500 shows two fire trucks stationed in Dominican Oaks' only access road.

Another safety concern are the helicopters regularly flying to and from Dominican Hospital with critically ill patients. They will now have a six story building in their

Exhibit N

possible flight path.We need an FAA evaluation of the location of the proposed building, but again Workbench has dragged its feet on this, although it has been brought to its attention.
On the health side, we have the impact of this major construction effort on the aged residents of Dominican Oaks and their concern that the new massive building may be the end of Dominican Oaks as they know it. Why? Because with a population of many in their 90s, there is normal attrition by death. Thus there are vacancies to be filled.

Exhibit N

Most of us believe it will be much harder to fill those vacancies when prospective tenants look out the window of the apartment they are considering and instead of the trees and light and open space they see today, they see rather a huge block of concrete, blocking
everything. Too many empty apartments will erode the income Dominican Oaks needs to sustain itself and bad things could follow,

I do hope there is a recommendation that the Commission consider, as it is

Exhibit N

authorized to do, the many health and safety challenges this project poses.

Respectfully yours,

John W. Weiser
resident, Dominican Oaks

Exhibit N

Jonathan DiSalvo

From: john weiser <jwweiser@gmail.com>
Sent: Wednesday, December 3, 2025 11:01 AM
To: Jonathan DiSalvo
Subject: 3500 Paul Sweet Rd.

Follow Up Flag: Follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Dear Mr. DiSalvo,
I am forwarding to you two letters I have written to the Planning Commission regarding the proposed Workbench project at 3500 Paul Sweet. I have since been told the letters should have gone to you. Apologies. I hope you find time to read them.

Respectfully.

Exhibit N

John W Weiser

Ladies and gentlemen,

The 3500 project is free enterprise run amok. Our free enterprise system encourages entrepreneurs to take risks in the hope of reaping rewards. Since the time Adam ate the apple we have needed some control on the overreach of entrepreneurs. We do this through government. We have two levels of government, city and county and, at a higher level, the state. The state has concluded that the county had abused its regulatory power and too severely limited low-income housing. The state therefore passed a law that limited how the county could control low income housing proposals through zoning and other means. Fortunately, the county was allowed to continue to regulate health and safety matters.

It does not take much imagination to see the 3500 project as a potential catastrophe. Abutting the 3500 site is the entrance to Chaminade, where there is a forest of eucalyptus trees. Those trees are known to be very flammable. If a fire started there, fire engines would come rushing down Paul Sweet Road and essentially block the road. Some fire engines may need to go on the entrance road to Dominican Oaks next door for access to the 3500 building. We can assume that the wage earners at 3500 would have taken the family car to go to work in the morning. When they hear of the fire they would most likely rush home to try to get their family out of harm's way. Next to 3500 is Dominican Oaks, a retirement community. We practice evacuation in case of fire. but we evacuate our building and then wait outside. In the case we're considering our residents in their walkers and wheelchairs would be standing by the side of the road hoping to be taken out of harm's way. But they would be standing in the likely path of the fire and too close to fire engines trying to save occupants of 3500.

Adult children of residents who live in Santa Cruz might also try to drive to Dominican Oaks to save their parent. There would be a convergence of vehicles jamming Paul Sweet Rd., with a large number of relatively immobile older people in the wrong place at the wrong time.

Exhibit N

Of course, heart attacks and strokes are not suspended during fire emergencies so ambulances would be trying to leave Dominican Hospital to pick up and bring back people whose lives are at serious risk. To do that ambulances must navigate the intersection at the head of Paul Sweet Rd, a very busy intersection. It has an exit from Highway 1, two entrances to the highway (north and south), the busy traffic of Soquel Avenue and the head of Paul Sweet Rd. Emergency vehicles heading to the scene of the fire would compound the problem.
You can probably add in your imagination other variants of this serious safety problem.
We trust that you will take these serious safety hazards into consideration and turn down this unfortunate project.

Sincerely,
John W. Weiser, resident
Dominican Oaks

I am 93 years old, well retired after a long, productive life. I am enjoying my active retirement. I live at Dominican Oaks, a first rate retirement community in a park-like setting, with excellent food, a full array of activities and a roster of other interesting, accomplished people. The fact that it is next door to the only full service hospital in the country is not overlooked.
Right now I am frightened, no, terrified, that all this might be lost and that late in life, handicapped by a stroke, I might be forced to move. What might cause this? The construction of a mammoth structure, right in our face six stories high and the equivalent of ten stories wide, which will block light and views from a large number of our apartments and turn our parklike setting into an urban nightmare. With a population of people many in their nineties, we expect attrition by death. The empty apartments left by our departed friends need to be rented. I fear that potential tenants driving under the huge tenement as they arrive and then looking squarely at that building as they check out the views from potential apartments will opt to look at

Exhibit N

other retirement communities. The logical concern is that DO's income will suffer and that the erosion from a profitable enterprise to one scrambling to cover costs will in time erode the quality of food and other services and in the worst case lead to the closure of DO or to its sale to a sharp penciled operator who breaks even by cutting services. So a jewel of Santa Cruz will be lost, while the tenants of 3500 scramble every day for places to park their cars and their children, looking for a place to play, dodge traffic as they play in the street. The justification for this serious disruption of our lives is to provide low income housing. The project proposes 6 apartments at low rents. Six families may be helped at a significant cost to the 220 residents of Dominican Oaks and potential adverse impact on its 100 employees.

I urge you to consider your many constituents who will be directly and adversely impacted by the proposed development and their families, indirectly impacted, many of whom are also your constituents.

Sincerely,
John Weiser
Apartment C212
Dominican Oaks

Exhibit N

Jonathan DiSalvo

From: john weiser <jwweiser@gmail.com>
Sent: Wednesday, December 3, 2025 11:01 AM
To: Jonathan DiSalvo
Subject: 3500 Paul Sweet Rd.

Follow Up Flag: Follow up
Flag Status: Flagged

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John W. Weiser, resident
Dominican Oaks

I am 93 years old, well retired after a long, productive life. I am enjoying my active retirement. I live at Dominican Oaks, a first rate retirement community in a park-like setting, with excellent food, a full array of activities and a roster of other interesting, accomplished people. The fact that it is next door to the only full service hospital in the country is not overlooked.
Right now I am frightened, no, terrified, that all this might be lost and that late in life, handicapped by a stroke, I might be forced to move. What might cause this? The construction of a mammoth structure, right in our face six stories high and the equivalent of ten stories wide, which will block light and views from a large number of our apartments and turn our parklike setting into an urban nightmare. With a population of people many in their nineties, we expect attrition by death. The empty apartments left by our departed friends need to be rented. I fear that potential tenants driving under the huge tenement as they arrive and then looking squarely at that building as they check out the views from potential apartments will opt to look at

Exhibit N

other retirement communities. The logical concern is that DO's income will suffer and that the erosion from a profitable enterprise to one scrambling to cover costs will in time erode the quality of food and other services and in the worst case lead to the closure of DO or to its sale to a sharp penciled operator who breaks even by cutting services. So a jewel of Santa Cruz will be lost, while the tenants of 3500 scramble every day for places to park their cars and their children, looking for a place to play, dodge traffic as they play in the street. The justification for this serious disruption of our lives is to provide low income housing. The project proposes 6 apartments at low rents. Six families may be helped at a significant cost to the 220 residents of Dominican Oaks and potential adverse impact on its 100 employees.

I urge you to consider your many constituents who will be directly and adversely impacted by the proposed development and their families, indirectly impacted, many of whom are also your constituents.

Sincerely,
John Weiser
Apartment C212
Dominican Oaks

Exhibit N

Jonathan DiSalvo

From:	Roy Brewer <rbrewer@brewerlofgren.com>
Sent:	Friday, December 12, 2025 10:52 AM
To:	Jonathan DiSalvo; Natalie Kirkish
Cc:	Jane Barr (alternate); Jenni Gomez (alternate); Jesse Nickell; Kami Bachir (alternate); Luke Rizzutto, Jr. (alternate); Renee Sheperd; Sandy Brown; Shane Pavonetti; Trina Barton; Yesenia Jimenez (vice chair)
Subject:	3500 Paul Sweet Road - Public Health & Safety: Noise
Attachments:	SCC Sustainability Update GP Noise Policies.pdf; Construction Equip Noise Levels.pdf

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Good morning,

This firm represents Dominican Hospital and the Dominican Oaks retirement community. Dominican Hospital is the only heart and stroke center in the county, has 222 licensed beds, and served more than 55,000 patients in the Emergency Room in twelve-month interval of between August 2024 and August 2025. Dominican Oaks is a 206-unit retirement community housing 216 residents with an average age of 88 years. Forty (40) of the residential units, representing approximately nineteen percent (19%) of the total units, are expressly designated and qualify as affordable housing.

We believe the following County and other public policy resource documents present quantifiable and objective public health and public safety criteria that must be applied to the development application for 3500 Paul Sweet Road before it is considered for approval:

1. The Noise Element of the County's General Plan requires an acoustical noise study for all new developments that may affect the existing noise environment of sensitive noise receptors and land uses. See the Noise Policies 9.1.1, 9.1.2, 9.2.3, and 9.2.6.
2. The County Code in Chapter 8.30 expressly prohibits offensive noise, and offensive noise is broadly defined in the chapter to include construction.
3. Chapter 13.15 of the County Code addresses public health concerns associated with noise, including the potential for adverse psychological or physiological effects on humans.
4. The state's concern for the effects of noise on people is expressed in public policy documents such as CEQA Guidelines Appendix G.
5. Federal policy is found in several places, including but not limited to the USEPA Noise Control Act.

We understand and believe that the County has determined the proposed development at 3500 Paul Sweet Road is not exempt from CEQA and, as a consequence, a CEQA Initial Study must be completed.
The Dominican Hospital and Dominican Oaks retirement community qualify as sensitive noise and vibration land uses and receptors as defined in the Noise Element of the Santa Cruz County General Plan adopted in 2020 and the SCC Sustainability Update Draft EIR (April 2022). For example:

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a. "Noise sensitive receptors are residents or occupants of land uses that generally include those uses where exposure to noise would result in adverse effects, as well as uses where quiet is an essential element of the intended purpose. Residential dwellings are sensitive receptors of primary concern...Noise-sensitive land uses also include schools and hospitals...churches, convalescent care facilities..." (SCC Sustainability Update, Draft EIR, 2022; citing "County of Santa Cruz 2020") (emphasis added)
b. Other examples of noise sensitive uses include nursing homes, retirement residences and communities, cemeteries, and similar uses.
c. SCC Sustainability Update, Draft EIR, 2022; citing General Plan policies addressing "Potential Impact" of uses that "Generate substantial permanent or temporary noise" (emphasis added)(copy attached for your convenience):
    i. "Require acoustical noise studies for new development that may affect existing noise environment affecting sensitive land uses and receptors or don't conform to accept noise exposure standards. (Noise Policy 9.1.1)" (SCC Sustainability Update, Table 4.12-9, Existing General Plan/LCP Policies that Avoid/Minimize Potential Impacts Related to Noise Increases, p. 4.12-23; 2022) (emphasis added)
    ii. "Incorporate noise considerations into the site plan review process related to access, parking, loading, and refuse collection areas. (Noise Policy 9.2.3)" (Ibid)
    iii. "Require noise reduction design elements recommended by a site-specific acoustical study where noise sensitive developments would be exposed to noise levels that exceed those considered 'normally acceptable.' (Noise Policy 9.1.2)" (Ibid)
    iv. "Require mitigation and/or best management practices to reduce construction noise as a condition of project approvals if noise levels would exceed 75 dB at sensitive land uses **or** if construction would occur for more than 7 days. (Noise Policy 9.2.6)" (Ibid) (emphasis added)

Similarly, the County Code addresses noise planning in Chapter 13.15:

d. "The purpose of this chapter is to recognize the relationship between noise and noise-sensitive land uses and the public health concerns associated with noise." (Santa Cruz County Code, Chapter 13.15, Noise Planning) (emphasis added)
e. "'Noise' means any sound which unacceptably exceeds the appropriate actual or presumed ambient noise level, or which cause or tends to cause an adverse psychological or physiological effect on humans. Some noises may also be defined as intrusive noise, offensive noise and/or a noise disturbance." (Santa Cruz County Code, Chapter 13.15, Noise Planning) (emphasis added)
f. "'Sound' means an oscillation in air pressure. The description of sound may include any characteristic of such sound, including duration, intensity and frequency." (Santa Cruz County Code, Chapter 13.15, Noise Planning)

County Code Chapter 8.30 addresses noise in the following manner:

g. "No person shall make, cause, suffer, or permit to be made an offensive noise. (Chapter 8.30.010(A))
h. "Offensive noise" means any noise which is loud, boisterous, irritating, penetrating, or unusual, or that is unreasonably distracting in any other manner such that it is likely to disturb people of ordinary sensitivities in the vicinity of such noise, and includes, but is not

Exhibit N

limited to, noise made by an individual alone or by a group of people engaged in any business, activity, meeting, gathering…or by any appliance, contrivance, device, tool, structure, construction, vehicle, ride, machine, implement, or instrument." (Chapter 8.30.010(B))

i. "The following factors shall be considered when determining whether a violation of the provisions of this section exists:
    i. Loudness (Intensity) of the Sound.
        1. Day and Evening hours. For purposes of this factor, a noise shall be automatically considered offensive if it occurs between the hours of 8:00 a.m. and 10:00 p.m. and it is:
            a. Clearly discernible at a distance of 150 feet from the property line of the property from which it is broadcast; or
            b. In excess of 75 decibels at the edge of the property line of the property from which the sound is broadcast…

A noise not reaching this intensity of volume may still be found to be offensive depending on consideration of other factors outlined below" (Chapter 8.30.030(C)) (emphasis added)

CEQA Guidelines Appendix G provides an Environmental Checklist Form for a CEQA Initial Study. Item M addresses Noise and two of the three questions are presented here:

j. "Would the project result in:
    i. "1. Generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?" (emphasis added)
    ii. "2. Generation of excessive groundborne vibration or groundborne noise levels?"

As noted above, the Dominican Oaks retirement community qualifies as a sensitive land use and receptor. With that as background and context, and applying the requirements of County Code Chapter 8.30.030(C), we believe the noise resulting from the construction of proposed residential tower will exceed the 75 decibels limitation at the property line of the property from which the sound emanates set forth in the code. See Table 4.12-7, "Construction Equipment Noise Emission Levels," at 50 feet in the SCC Sustainability Update Draft EIR, attached hereto for your convenience. Construction equipment listed includes backhoe (80 dBA at 50 feet), compactor (93 dBA), Concrete Mixer Truck (85 dBA), Concrete Saw (90 dBA), Crane (85 dBA), Dozer (85 dBA), Excavator (85 dBA), among many others.

The applicant's proposed residential tower has a proposed setback of 0'1" from the property line directly across from the entrance to and second floor food service area of Dominican Oaks retirement community. (Sheet AP1.04 of the Applicant's submittal) The distance from the property line to the Dominican Oaks building and second floor food service area is approximately 23 feet. The food service area on the second floor is the sole dining room for over 150 residents for all their meals, and that room is the closest in proximity to the proposed tower building. Additionally, the outer rotunda offers outside dining that would be unusable during construction due to noise and debris. The Dominican Oaks community would essentially have to lock down the entire dining room - no open doors or windows - in an attempt to preserve the quality of the dining experience.

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The construction noise levels will exceed the standards set forth in the Noise Element and County Code and be detrimental to the health and safety of the elderly sensitive receptors living at Dominican Oaks.

Additional regulatory references include, but are not limited to, the following:

k. The U.S. Environmental Protection Agency Noise Control Act (Public Law 92-574) identifies indoor and outdoor noise level limits to protect public health.

Sources of groundborne vibrations include natural phenomena and human activities. Human activities giving rise to noise and vibrations include construction related activities such as impact pile driving, jackhammers, and construction equipment used for excavation, grading, moving fill material, mixing concrete and cement or other materials, cranes, and similar equipment.

Annoyance to people arising from groundborne vibration can occur when the vibration in question exceeds the threshold of human perception by only a small degree. Annoyance to people is a function of the number and duration of vibration-inducing events and the health and noise and vibration sensitivity of the people being affected.

Based on the citations presented above, we believe quantifiable and objective public health and public safety standards and policies exist and must be applied to the proposed project before it can be considered at a public hearing.

Thank you for your consideration.

Roy E. Brewer
Master of Laws (LLM) in Dispute Resolution

BREWER LOFGREN LLP
ATTORNEYS AT LAW

Carmichael & Folsom California
916.425.4477 Mobile www.brewerlofgren.com

Exhibit N

Table 4.12-7. Construction Equipment Noise Emission Levels

Equipment Description	Acoustical Use Factor (%)	L_{max} at 50 feet (dBA, slow)[1]
Auger Drill Rig	20	85
Backhoe	40	80
Blasting[2]	N/A	94
Compactor (ground)	20	93
Compressor (air)	40	80
Concrete Mixer Truck	40	85
Concrete Pump Truck	20	82
Concrete Saw	20	90
Crane	16	85
Dozer	40	85
Dump Truck	40	80
Excavator	40	85
Flat Bed Truck	40	84
Front End Loader	40	80
Generator	50	82
Grader	40	85
Jackhammer[2]	20	85
Mounted Impact Hammer (hoe ram)[2]	20	90
Pavement Scarafier	20	85
Paver	50	85
Pneumatic Tools	50	85
Pumps	50	77
Rock Drill	20	85
Roller	20	85
Scraper	40	85
Tractor	40	84
Vacuum Excavator (Vac-truck)	40	85

Source: DOT 2006; FTA 2018.
Notes: L_{max} = maximum noise level; dBA = A-weighted decibels; N/A = not applicable.
[1] All equipment fitted with a properly maintained and operational noise control device, per manufacturer specifications.
[2] Impulsive/impact device.

Table 4.12-9. Existing General Plan/LCP Policies that Avoid/Minimize Potential Impacts Related to Noise Increases

Potential Impact	Policies
Generate substantial permanent or temporary noise	• Require noise reduction design elements recommended by a site-specific acoustical study where noise sensitive devleopments would be exposed to noise levles that eceed those considered "normally acceptable." (Noise Policy 9.1.2) • Noise levels in common outdoor use areas in multi-unit residential development should not exceed DNL 60. dB. Where this cannot be met by reasonable measures, such as strategic site layout and noise barriers, DNL 65 dB might be considered acceptable. (Noise Policy 9.1.3) • Require acoustical studies for new development that may affect existing noise environment affecting sensitive land uses and receptors or don't conform to accept noise exposure standards. (Noise Policy 9.2.1) • Require site-design and noise reduction measures for any project, including transportation projects, that would cause significant degradation of the noise environment with 3-5 dB increase. (Noise Policy 9.2.2) • Incorporate noise considerations into the site plan review process related to access, parking, loading, and refuse collection areas.(Noise Policy 9.2.3) • Require best available control technoloiges for new commercial and industrial developments that would increase noise levels above the normally acceptable standardsin Table 9-3 in the Genreal Plan. (Noise Policy 9.2.4) • Require noise mitigation strategies that are preferable to construction of conventional masonry noise barriers where these strategies are a feasible option to reduce impacts on sensitive uses. (Noise Policy 9.2.5) • Require mitigation and/or best management practices to reduce construction noise as a condition of project approvals if noise levels would exceed 75 dB at sensitive land uses or if construction would occur for more than 7 days. (Noise Policy 9.2.6) • Enforce the County of Santa Cruz Noise Ordinance (County Code Chapter 8.30) to ensure that unlawful noise-generating activities and offensive noise are subject to enforcement. (Noise Policy 9.6.2)
Noise generated by special uses and special events	• Sound limitations specified for wineries. (Noise Policy 9.3.1) • Construct, maintain and operate facilities and equipment associated with mining operations in compliance with conditions of permit approval; noise level measured at the property boundaries shall not be greater than 60 dB for a cumulative period of 15 minutes during any hour of operation. (Noise Policy 9.3.3) • For permits for special or periodic uses or activities that will generate noise not typical for the context of the proposed location, impose conditions of approval that limit the maximum noise level, extent, duration, timing, operating hours, frequency, location or other aspect of the use and may require special monitoring may be imposed. (Noise Policy 9.3.4)
Traffic-related noise	• Use speed limit controls on local streest to minimize vehicle traffic noise. (Noise Policy 9.4.1) • Continue to consider noise concerns in evaluating all proposed devleopment decisions related to roadway Noise Policy 9.2) and other transportation projects. (Noise Policy 9.3)

Exhibit N

Jonathan DiSalvo

From: Roy Brewer <rbrewer@brewerlofgren.com>
Sent: Wednesday, December 3, 2025 4:13 PM
To: Jonathan DiSalvo; Natalie Kirkish
Cc: s.pavonetti@gmail.com; jessenickell3art@gmail.com; Trina Barton; yeseniajduran@gmail.com; renee@reneesgarden.com
Subject: 3500 Paul Sweet Road Application

Follow Up Flag: Flag for follow up
Flag Status: Flagged

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This firm represents Dominican Hospital and the Dominican Oaks retirement community. Dominican Hospital is the only cardiac and STEMI center for Santa Cruz County (STEMI is ST-elevation myocardial infarction, a severe type of heart attack). Dominican Hospital is the primary source of acute emergency care for the county, with 222 beds and accommodating more than 55,600 emergency room visits in the twelve months between August 2024 and August 2025. The Dominican Oaks retirement community has 206 residential units accommodating 216 residents with an average age of 88 years. Forty (40) of the residential units at Dominican Oaks, representing greater than nineteen percent (>19%) of the total number of units, are expressly set aside as affordable residences, representing a significant contribution to the housing of seniors in the greater Santa Cruz community.

Both Dominican Hospital and the Dominican Oaks retirement community qualify as sensitive receptor communities as defined by a variety of local, regional, and state standards, rules, and regulations. Consider:

> "Sensitive receptors are children, elderly, asmatics and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. The locations where these sensitive receptors congregate are considered sensitive receptor locations. Sensitive Receptor locations may include hospitals, schools, and day care centers, and such other locations as the air district board or California Air Resources Board may determine." (California Air Resources Board) ("asmatics" appears here as it does in the original.)
>
> "People most likely to be affected by air pollution include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. The term 'sensitive receptors' is used to refer to facilities and structures where people who are sensitive to air pollution live or spend considerable amounts of time." (Santa Cruz County Sustainability Update Draft EIR, at 4.3.1.3, p. 4.3-9)
>
> "A sensitive receptor is defined as any residence, including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergartens through grade twelve (k-12) schools; daycare centers; and health care facilities such as hospitals or retirement and nursing homes (MBARD 2008)." (County of

Exhibit N

Santa Cruz, CEQA Initial Study/Environmental Checklist, October 16, 2024, Application Number 231264, p. 29) [note: "MBARD" is the Monterey Bay Air Resources District]

"Sensitive receptors refer to those segments of the population most susceptible to poor air quality (i.e., children, elderly and the sick) and to certain at-risk sensitive land uses such as schools, hospitals, parks, or residential communities." (South Coast Air Quality Maintenance District)

"'Sensitive receptor' means a residence, including any private home, condominium, apartment, or living quarter; an education resource, including a preschool, kindergarten, grades 1 to 12, day care center, park, playground, university, or college; a community resource center, including a youth center; a health care facility, including a hospital, retirement home, or nursing home; live-in housing, including a long-term care hospital, hospice, or dormitory; and any building housing a business that is open to the public." (City of Brentwood)

"'Sensitive Receptor' means…and health care facilities such as hospitals or retirement and nursing homes. A sensitive receptor includes individuals housed in long term care hospitals, prisons, and dormitories or similar live-in housing." (Initial Statement of Reasons, Thermal Spraying ATCM. California Environmental Protection Agency, Air Resources Board. September 2005)

Based on the definitions provided above, Dominican Hospital and the Dominican Oaks retirement community both qualify as sensitive receptors.

Our concern is for health impacts of construction dust and emissions from construction equipment to the sensitive receptors at the hospital proximate to the proposed residential tower and the Dominican Oaks retirement community immediately adjacent to the proposed development. Our concern extends to, but is not limited to, the effects of PM_{10} and $PM_{2.5}$, both of which pose greater risks to health than larger particulate matter. Consider:

"$PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections" (SCC Sustainability Update, April 2022, p. 4.3-5)

"A number of adverse health effects have been associated with exposure to both $PM_{2.5}$ and PM_{10}. For $PM_{2.5}$, short-term exposures (up to 24-hour duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting or lung diseases." (SCC Sustainability Update, Draft EIR, April 2022, p. 4.3-5)

"PM_{10} and $PM_{2.5}$: Most Relevant Effects: (a) excess deaths from short-term exposures and exacerbation of symptoms in sensitive patients with respiratory disease; (b) Excess seasonal declines in pulmonary function, especially in children; (c) Increased risk of premature death from heart or lung diseases in the elderly." (South Coast Air Quality Management District)

Exhibit N

> "The Air Basin is designated as a non-attainment area for the state PM_{10} standards." (SCC Sustainability Update, Draft EIR, April 2022, at p. 4.3-9)

$PM_{2.5}$ is a consequence of fuel combustion, such as that associated with construction equipment. To the extent the development of the proposed residential tower immediately adjacent to and with as little as only 0'1" setback from the Dominican Oaks property line (see Sheet AP1.04 of the Applicant's submittal) involves grading equipment, excavation for the underground parking spaces, and cranes and other equipment for construction of the eighty-one foot (81') tower, the elderly residents of Dominican Oaks will be exposed to unhealthy air quality for at least the duration of construction. The health risk consequences to sensitive receptors of even short-term exposure to particulate matter associated with fuel combustion in construction equipment has been well documented in objective standards, rules, and policies presented above.

In addition, consider this quote from the Santa Cruz County Sustainability Update Draft EIR of 2022 citing the California Health and Safety Code:

> "Section 41700 of the Health and Safety Code states that a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons r to the public; or endanger the comfort, repose, health, or safety of any of those persons or the public; or that cause, or have a natural tendency to cause, injury or damage to business or property (Health and Safety Code Section 41700). This section also applies to sources of objectionable odors." (SCC Sustainability Update, Draft EIR, April 2022, p. 4.3-16)

The paints and other coatings of the exterior and interior of the proposed residential tower may pose air quality issues for the sensitive receptors and at-risk elderly residents of the Dominican Oaks retirement community, as well as patients at Dominican Hospital.

We believe the objective criteria presented above provide sufficient reason to deny the project. At a minimum, a health risk assessment is warranted before the project can proceed.

Thank you for your consideration of this material.

Roy E. Brewer
Master of Laws (LLM) in Dispute Resolution

BREWER LOFGREN LLP
ATTORNEYS AT LAW

Carmichael & Folsom California
916.425.4477 Mobile www.brewerlofgren.com

Exhibit N

Jonathan DiSalvo

From: aria sabour <aria.sabour@gmail.com>
Sent: Friday, December 26, 2025 11:26 AM
To: Jonathan DiSalvo
Subject: 3500 Paul Sweet Road Application

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Hi Jonathan,

I hope you're doing well. I'm writing to share my support for the proposed housing project at 3500 Paul Sweet Road. Housing is deeply needed in our community, and I appreciate the work the County has put into reviewing this application.

The project has clearly been carefully vetted over the years of review, it is CEQA exempt, and it is a compliant housing application. I'd really like to see it move forward through approval so it can ultimately deliver much-needed homes for Santa Cruz's renters.

Thank you for your time and for everything you do for the County and community.

Best regards,

Aria Sabour

Exhibit N

Jonathan DiSalvo

From:	Rachel Howley CA-Santa Cruz <rachel.howley@commonspirit.org>
Sent:	Monday, January 5, 2026 9:16 AM
To:	Natalie Kirkish; s.pavonetti@gmail.com; jessenickell3art@gmail.com; Trina Barton; yeseniajduran@gmail.com; renee@reneesgarden.com; Jonathan DiSalvo
Subject:	3500 Paul Sweet Road Development Concerns from Dominican Hospital and Dominican Oaks
Attachments:	Dominican Hospital Contributions .docx
Follow Up Flag:	Follow up
Flag Status:	Flagged

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Santa Cruz County Planning Commission
701 Ocean Street, Room 525
Santa Cruz, CA 95060

RE: Consideration of Dominican Hospital and Dominican Oaks Impacts Related to Proposed Development at 3500 Paul Sweet Road

Dear Santa Cruz County Planning Commissioners,

I am writing on behalf of Dominican Hospital and Dominican Oaks, both operated by CommonSpirit Health, to provide additional context regarding our mission, the breadth of services we provide to Santa Cruz County residents, and the potential operational implications of the proposed 3500 Paul Sweet Road residential development.

This letter is intended to ensure that the County's land use planning decisions fully consider the long-term safety, access, and sustainability of the County's only acute-care hospital campus and its only nonprofit, mission-driven senior housing community; both of which function as essential public safety and health infrastructure for Santa Cruz County.

Mission, Stewardship, and Community Commitment

Dominican Hospital operates as a nonprofit healthcare provider guided by CommonSpirit Health's mission *to make the healing presence of God known in the world by improving the health of the people we serve, especially those who are vulnerable*. Stewardship is a core value of this mission and requires the careful, responsible allocation of resources to ensure continuous access to safe, high-quality care for the entire county.

For decades, Dominican Hospital has served as the county's healthcare safety net, prioritizing community investment well beyond required care delivery. This includes substantial charity care, workforce development programs, wellness programming, mobile clinics, and direct grants to community organizations. These initiatives exist because Dominican has historically been able to operate within a stable, predictable

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environment that allows focus not only on immediate patient care, but on long-term community health improvement.

Essential and Sole-Source Services for Santa Cruz County

Dominican Hospital provides multiple services that are either sole-source or uniquely designated within Santa Cruz County, including:

- The county's only full-service acute-care hospital, with comprehensive life-saving technology
- The county's designated STEMI (heart attack) receiving center, providing 24/7 access to cardiac catheterization and life-saving intervention
- A certified stroke center, ensuring rapid diagnosis and treatment when minutes determine outcomes
- The county's only Level III Neonatal Intensive Care Unit (NICU), caring for the most medically fragile newborns and allowing families to remain close to home
- Participation in the county's Sexual Assault Response Team (SANE/SART), providing specialized space and services for victims of sexual assault
- An RN Residency Program supporting workforce stability and patient safety
- A Graduate Medical Education (GME) residency program, training future primary care physicians who serve both the hospital and county clinics—at no cost to the county

In addition, Dominican operates a wellness center and a mobile wellness clinic, extending preventive care and health education beyond hospital walls and into the community.

These services are not easily replicated or relocated. Their effectiveness depends on uninterrupted emergency access, reliable county infrastructure (i.e., safe roadways, ambulance services, fire safety, evacuation protocols, traffic quality, etc.), in order to deliver operational stability from our facility to the public.

Dominican Oaks: Protecting a Safe Place for Aging with Dignity

Dominican Oaks, owned and operated by CommonSpirit Health, is the only senior housing community in Santa Cruz County operated by a nonprofit healthcare system specifically serving low-income seniors. It is a permanent home for older adults who have spent their lives contributing to this community and now rely on a safe, calm, and accessible environment for the remainder of their years.

Many residents live with:

- Limited mobility
- Cognitive or memory impairment
- Chronic health conditions requiring close proximity to emergency services

The adjacency of Dominican Oaks to Dominican Hospital was intentional, ensuring rapid emergency response, continuity of care, and a sense of safety for residents and families. Increased traffic congestion, emergency

Exhibit N

access complexity, noise, or environmental disruption disproportionately impacts this vulnerable population and places additional operational and safety responsibilities on the hospital.

Operational Realities and Resource Reallocation

Dominican Hospital's essential services already operate within the constraints of regional geography, aging infrastructure, and extended emergency transport times.

In fiscal year 2025 Dominican Hospital experienced 52,918 ER visits from county residents, the highest number of ER visits in five (5) years.

From August 2024 through August 2025, the average county ambulance transport time to Dominican Hospital was 43 minutes, exceeding the widely accepted 30-minute standard for time-sensitive emergency care. Under these conditions, maintaining unobstructed access, predictable traffic patterns, and secure operational boundaries is not optional; it is critical to patient survival.

Approval of a dense residential development immediately adjacent to the hospital and senior housing operations would require Dominican and CommonSpirit Health to reassess how limited resources are allocated. Increased demands related to:

- Emergency access protection
- Traffic mitigation
- Parking management
- Security staffing
- Insurance and risk management
- Infrastructure modifications

This development approval would shift organizational allocations of scarce resources to focus toward preserving a safe operating environment for patients, seniors, staff, and emergency responders.

While Dominican remains deeply committed to community benefit, resources directed toward mitigating development-related impacts are resources that cannot simultaneously be invested in expanded community programs, workforce initiatives, grants, and preventive health services.

Community Benefit Depends on Operational Stability

In Fiscal Year 2024, Dominican Hospital provided $40.5 million in charity care, grants, and community health investments benefiting Santa Cruz County residents. These contributions reflect a long-standing commitment to go beyond minimum requirements and serve as a true community partner.

However, sustained community investment is only possible when the hospital and senior housing campus can operate safely, efficiently, and without undue external strain. Land use planning decisions that increase operational complexity or risk may unintentionally constrain the hospital's future capacity to maintain the same level of discretionary community support.

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Request for Consideration

Dominican Hospital and Dominican Oaks want to remain strong, stable, and fully engaged partners in Santa Cruz County's future. We respectfully ask the Planning Commission to carefully consider whether the proposed 3500 Paul Sweet Road development, as currently designed, adequately protects:

- Emergency medical access
- Senior resident safety
- Hospital operational integrity
- The long-term sustainability of county-wide healthcare services and community benefit programs

Thoughtful conditions, design modifications, or mitigations may help balance housing needs with the preservation of essential healthcare and senior services that serve the entire county.

Closing

Dominican Hospital and Dominican Oaks exist to serve the most vulnerable members of our community, patients in medical crisis, aging seniors, families welcoming medically fragile newborns, and individuals relying on emergency care when minutes matter.

We appreciate the Commission's careful consideration of these issues and its responsibility to ensure that growth in Santa Cruz County strengthens rather than inadvertently compromises the systems that safeguard community health, safety, and dignity.

Respectfully,

--

Rachel Howley

VP, Ancillary Services

Dignity Health
Dominican Hospital
1555 Soquel Drive

Santa Cruz, CA 95065
831.462.7336 (O) 561-721-5769 (C)

Rachel.Howley@commonspirit.org

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Jonathan DiSalvo

From: Jacob McEvoy <jpmcevoy@gmail.com>
Sent: Monday, December 8, 2025 2:49 PM
To: Jonathan DiSalvo
Subject: 3500 Paul Sweet Road Development Concerns

Follow Up Flag: Follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

My name is Jacob McEvoy, and I'm a resident of Lupine Lane. I'm writing to state my *opposition* to the proposed 6-story, 105-unit project at *3500 Paul Sweet Road*.

As a nearby resident, I'm concerned about the project's *unrectified safety issues* regarding compromised evacuation routes for residents about Paul Sweet Road (our only egress), inadequate fire-apparatus access, and the unresolved FAA compliance related to the Dominican hospital heliport. These directly impact the lives of nearby residents, first responders, and hospital operations.

Moreover, building a structure of this size on a ½-acre lot is fundamentally incompatible with the area and will cause severe traffic and parking problems for us (residents) about Paul Sweet Road. The Soquel - Paul Sweet Road intersection is already challenged by Brookwood Drive highway diversion traffic late afternoon.

Lastly, if this is slated to be affordable housing, there is a cost challenge given the zone we live in is an extreme fire risk area (*very high insurance premiums*). Has this been considered?

Given these risks, I humbly request the County to *deny the project as currently proposed* or require a redesign at minimum to improve fire egress and traffic flow of our greater neighborhood.

Thank you for considering my response. If you have any questions or would like to follow up with me please reply, or we can arrange a phone call.

Regards,

Jacob

8318892039

Exhibit N

Jonathan DiSalvo

From: Virginia Lieb <virginia@lieb.com>
Sent: Thursday, December 4, 2025 11:27 AM
To: Jonathan DiSalvo; Manu Koenig; Jesse Nickell; janerbarr@aol.com; Trina Barton; Sandy Brown; yeseniajduran@gmail.com; kami@davidlyng.com; renee@reneesgarden.com; jagomez173@gmail.com
Cc: Rachel Howley; Lou McTamaney; Amy Saulnier CA-Santa Cruz; Roy Brewer
Subject: 3500 Paul Sweet Road non compliant with laws of the ADA (Americans with Disabilities Act)

Follow Up Flag: Follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Hello,

Senior disabled people in a retirement facility are protected under federal disability and housing laws, and a builder's actions creating dangerous conditions may violate these laws. The key laws that apply are under Title III of the Americans with Disabilities Act (ADA).

- Seniors with impairments like limited mobility, vision/hearing issues, or chronic conditions are defined as individuals with disabilities under these acts and are therefore entitled to protection. Most of the residents of Dominican Oaks fit this group.

- Protection against Dangerous Conditions: If a builder's actions, such as construction next door, create hazardous conditions that disproportionately endanger disabled seniors (e.g., blocking accessible routes or creating excessive noise/vibration/airborne dust and pollution that impacts health conditions), this could be considered a failure to provide equal access or a failure to make reasonable accommodations under the FHA/ADA.

For these reasons and for all the many other health and safety deficiencies with 3500 Paul Sweet Road, please reject approval of this project. Our lives are at stake.

Sincerely,
Virginia W. Lieb

Exhibit N

Resident, Dominican Oaks
484-678-8301

Exhibit N

Jonathan DiSalvo

From: Joe Ruiz <ruizjoe33@yahoo.com>
Sent: Friday, January 2, 2026 1:13 PM
To: Jonathan DiSalvo
Subject: 3500 Paul Sweet Road Project

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Hi Jonathan,

Happy New Year!

I'm writing to share my support for the proposed housing project at 3500 Paul Sweet Road. Housing is deeply needed in the community, and I appreciate the work the County has put into reviewing this application.

The project has clearly been carefully vetted over the years of review, it is CEQA exempt, and it is a compliant housing application. I'd really like to see it move forward through approval so it can ultimately deliver much-needed homes for Santa Cruz's renters.

Thank you for your time and for everything you do for the County and community.

Best regards,

Joe Ruiz

Exhibit N

Jonathan DiSalvo

From: Roy Brewer <rbrewer@brewerlofgren.com>
Sent: Thursday, November 20, 2025 3:23 PM
To: Jonathan DiSalvo
Cc: Natalie Kirkish
Subject: 3500 Paul Sweet Road Traffic Analysis

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Good afternoon, Jonathan,

Our firm represents the Dominican Oaks retirement community, a 204-unit residential community immediately adjacent to the proposed development. We offer the following comments on the traffic analysis submitted by the applicant:

1. There is no assessment of on-site circulation or access, including access by emergency vehicles and first responders. This presents a public safety risk that should be addressed.
2. There is a curve along Paul Sweet Road north of the driveway for the proposed development. There is no assessment of sight distance and angle between the proposed driveway location and the curve, nor any assessment of the ability of drivers at either location to see each other and avoid accidents, particularly if the drivers on Paul Sweet Road are driving at a posted speed, or in fog, or during inclement weather. This public safety risk should be evaluated.
3. Presuming the table in the study and the requests of the applicant as reflected on their plans are accurate, the on-site parking being proposed is 39 spaces less than required by County Code – 74 spaces proposed rather than the 113 spaces required by Code. A recent observation of parking in the area immediately proximate to the proposed development between 7:30 AM and 11:30 AM on a weekday confirmed that there is not sufficient on-street parking for existing conditions. Parking along the west side of Paul Sweet Road was full, including two ambulances parked across the street from the proposed development site. The existing parking circumstances will be exacerbated by the demand for any additional spaces, and certainly by 39 additional spaces.
4. In addition, parking along the west side of Paul Sweet Road is not permitted between 12:00 midnight and 6:00 AM. Where will the residents of the proposed development who do not have benefit of on-site parking spaces park at night? If the presumption is, even in part, that on-street parking is the solution, this, too, presents a public safety risk that should be evaluated: parking along Paul Sweet Road as an impediment to first responders in the event of a fire or other emergency.
5. In addition, how will additional on-street parking demand from the proposed development affect those who already rely on that parking for hospital and cemetery visits?

Exhibit N

6. While the proposed development is within a half mile of bus stops for Bus Route 1, the bus route has projected headways of 20 minutes during peak hours, not the 15 minutes required to qualify as a high-quality transit corridor. See the projected headways published in the Santa Cruz Metro Bus Rider's Guide for Fall 2025, dated as effective September 11, 2025. See pages 23, Route 1, Weekday – Outbound; page 25, Route 1 Weekend – Outbound; page 27, Route 1, Weekday – Inbound; and page 29, Route 1, Weekend - Inbound. Note, too, that these are the projected headways and the actual headways may be, as with other transit systems, longer. In any event, the published headways do not reflect qualification as a high-quality transit corridor.
7. Note that Figure 4 in the applicant's VMT Screening Memo depicts "Major Transit Stops ½ Mile Walkshed" and is markedly different from Figure 2 in the applicant's letter to the County dated May 15, 2025, at page 12. The latter figure says: "Subject site is located within 1/2 -mile walkshed of a high quality transit corridor," yet that statement is in direct conflict with Figure 4 in the VMT Screening Memo and the definition of a high-quality transit corridor. Reliance on a City of Santa Cruz GIS exhibit rather than the Santa Cruz Metro service tables, published headways, the exhibit in the applicant's own commissioned traffic analysis, and the definition of high-quality transit corridors appears to be an attempt to mislead the reader.
8. Regarding pedestrian circulation (section 2.1, page 4), there is no sidewalk on the west side of Paul Sweet Road and no pedestrian facility on the west side to serve.
9. Regarding Figure 3-5, the volumes appear to be mostly on-ramp volumes. What are the number of right turns onto Paul Sweet Road?
10. Regarding section 6.0 Future Traffic Conditions, identify the "other known development projects (cumulative projects)" that were "provided by Santa Cruz County staff" and considered in the analysis.
11. In addition, what are the trip generation numbers and distribution of trips for those other development projects?
12. The VMT memo provided by the applicant expressly states repeatedly that the proposed development does not screen out and "thus will require further VMT analysis." (see page 9 of the VMT memo)
13. In the Vistro LOS calculation worksheets in Appendix B, the westbound through and right turn volumes on Soquel Drive were incorrectly entered for all analysis scenarios. A majority of the right turn movements entered in Vistro, as well as shown in Figures 3-5, and 6-1 through 6-5, are volumes destined to the Highway 1 northbound on-ramp, not to Paul Sweet Road. This incorrect input of the westbound through and right turn volumes results in incorrect reporting of the intersection's delays and levels of service (LOS). The Vistro network in the traffic analysis should be revised and setup to account for both the westbound through lanes and on-ramp lane on the west leg of the intersection.

Based on the points presented above, the traffic analysis should not be accepted as provided and instead should be revised to address the points presented in this email.

Please confirm your receipt of this email and the County's decision regarding revisions to the traffic analyses.

Thank you.

Exhibit N

Roy E. Brewer
Master of Laws (LLM) in Dispute Resolution

BREWER LOFGREN LLP
ATTORNEYS AT LAW

Carmichael & Folsom California
916.425.4477 Mobile www.brewerlofgren.com

Exhibit N

Jonathan DiSalvo

From: Topsy Smalley <topsyneher@gmail.com>
Sent: Sunday, December 14, 2025 3:01 PM
To: Jonathan DiSalvo
Subject: 3500 Paul Sweet Road

Follow Up Flag: Follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

14 December 2025

TO: Santa Cruz Board of Supervisors and Santa Cruz Planning Commission
RE: 3500 Paul Sweet Road Application Number: 241360 Assessor's Parcel Number: 025-013-37; 102-061-10

Dear Senior Planner DiSalvo:

The purpose of this letter is to provide the proper authorities with information in the sphere of health and safety to reject this project.

The impacts of this project are already being felt among the residents of Dominican Oaks. From January 2025 to date, there have been 10 deaths in Dominican Oaks; that number is double the long-term annual average of 5 deaths per year. What is the cause of this huge, one hundred percent increase in deaths? There is nothing that has a larger impact on the residents of Dominican Oaks than the fear of a 60 foot tall building about 50 feet from our home.

There has been considerable discussion about traffic, density, setbacks and many other important items. However, there is one extremely important subject, which is:

> THE MENTAL AND PHYSICAL IMPACT THIS PROJECT WILL IMPOSE ON THE 220 RESIDENTS OF DOMINICAN OAKS!
>
> PLEASE DO NOT SEND YOUR MOTHER OR GRANDMOTHER OVER TO LIVE HERE BECAUSE IT WILL NOT BE THE ENJOYABLE SAFE PLACE WE HAVE NOW IF THIS PROJECT IS BUILT!

According to studies we have reviewed, there are numerous health and safety issues, especially with older residents. This proposed 6 story building will be about 50 feet from the 70, 80, 90 and some 100 year old residents. This project will require several months of just digging out thousands of cubic yards of dirt. After the dirt is removed, there will be well over a year of heavy building. Then, Dominican Oaks residents will be saddled with a 60 foot or more building that blocks the sun, in addition to the wind

Exhibit N

impacts on the building. With well over 100 additional cars coming and going, and about 150 new residents so near next door, the serenity of Dominican Oaks will be destroyed.

How does the builder control the noise and dust to acceptable levels during the several months of land clearing and excavating for a parking garage? There will be noise and dust on the sidewalks, in rooms, dining areas, and outside everywhere. And in lungs.

A large number of large dump trucks and smaller vehicles will create an extremely dangerous situation because this is the spot where Dominican Oaks residents cross over Paul Sweet Road to walk in the cemetery. Many of our residents walk in the cemetery daily. Will all this be taken away from them for a long time?

This walk in the cemetery, along with walks on Dominican Oaks sidewalks, is the primary exercise for many residents. Walking is a significant mental and physical benefit to the health and welfare of our community. It is obvious that the impact of this construction project will place a heavy burden on their mental and physical health.

This is exactly what the studies we have reviewed said would occur under these conditions.

The developer of this project cannot build this project without significant disruption of the daily lives of 200 residents and some 80 employees. The builder may argue that this construction period will be temporary, let's say two years. If you see the two years as temporary, you are not 90 years old. At this age, two years may be a lifetime.

We are old people and we know what the builder wants to do. The builder wants to build a 60 foot high apartment building in an isolated location 1.8 miles from a grammar school, with a junior high school 1.8 miles in the opposite direction, and one third mile to a bus stop (try walking one third mile with 10 pounds of groceries on a 4 foot wide sidewalk with no street lights) and with little place for children to play.

At Dominican Oaks we have a current events meeting on Monday evenings. The meeting draws 59 or so residents every meeting. The subject of this building was introduced many months ago. In recent weeks, it has been the only subject on the agenda. Attending a meeting would let you hear how people are coping with the planning of the project. Many residents share their concerns, their fear of impending change in lifestyle, the loss of sunlight imposed, the loss of air flow, and the additional increase in cars and traffic. Their anxiety is building every week.

Sincerely,

Daniel F. Kriege
kriege7@gmail.com

--
Topsy Neher Smalley
Research Librarian
Santa Cruz, CA 95065 USA
Help for Researchers http://topsyneher.org

Exhibit N

(831) 464-3354

Exhibit N

Jonathan DiSalvo

From: sean.a.swift@gmail.com
Sent: Tuesday, December 23, 2025 12:43 PM
To: Jonathan DiSalvo
Subject: 3500 Paul Sweet Road

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Hi Jonathan - I hope you are doing well! I just wanted to write you a quick note in support of Workbench's project at 3500 Paul Sweet Road.

As you know, I would LOVE to call Santa Cruz my home (given my close connections to the community and active involvement with John), but I was priced out of the market! Just think how easy the holidays would be if I could find a place to live **IN** Santa Cruz (would certainly result in less driving).

I'm excited that Workbench is working to bring much needed housing to the community - more housing is the only solution to avoiding displacement and meeting the extreme demand (who wouldn't want to live in Santa Cruz County!).

Thank you,
Sean Swift

Exhibit N

3500 Reasons Why 3500 Paul Sweet Rd Should Never Be Built

Quantity	Health/Safety risks & the people & businesses these risks endanger
246	Patients at Dominican Hospital
230	Employees of Chaminade
200	Restaurant guests at Chaminade
155	Overnight guests at Chaminade
225	Residents of Dominican Oaks
250	Family members of Dominican Oaks residents
125	Staff at Dominican Oaks
35	Other property owners on Paul Sweet Road, Lupine Lane, Dempsey Rd
55	Employees of AMR (American Medical Response)
58	Employees of City of Santa Cruz Fire Department
1900	Employees of Dominican Hospital
21	Health and safety dangers (listed below)

3500	Total

At the proposed site, the 3500 Paul Sweet Road, project does pose several specific, unmitigable health and safety risks. No amount of additional data development would address or resolve the following 21 issues:

1. **3500 Project impacts ambulance response times.** Current data shows that ambulances are only meeting their 15-minute response time metric for heart attack and stroke patients 50% of the time. Increased traffic from this project will create bottlenecks on Paul Sweet Road, only worsening ambulance response times.
2. **3500 Project is in violation of FAA regulations for height of buildings near heliports**. Our neighbor, Dominican Hospital, has an active heliport. Yet this project does not conform to FAA regulations for building height near a helipad. At 82 feet in height, this proposed project is located only 834 feet from the hospital helipad. This greatly exceeds the FAA height limit for buildings near a helipad. To conform to FAA regulations, the height of the 3500 Paul Sweet Road project is limited to a maximum height of 33 feet. As of now, it appears that Workbench has not filed FAA Form 7460–1, despite repeated requests to do so.
3. **Paul Sweet Road is the only evacuation route** for Dominican Oaks as well as other surrounding residences and businesses. Adding hundreds of additional cars from this new project will create gridlock on this dead-end street that is so narrow, that trucks and fire engines cannot turn around. This ill-conceived project will turn that sole lifeline into a deadly bottleneck.
4. **3500 Project endangers timely evacuation in life-or-death emergencies**. Senior residents at Dominican Oaks move more slowly using canes, walkers or wheelchairs. This requires more time and assistance to evacuate during a fire or other emergency. This project could significantly delay or block the ability of residents and emergency vehicles to reach the hospital quickly, resulting in the difference between life and death. Protecting clear, prompt and reliable access to medical care should remain a priority for planning decisions in our area.

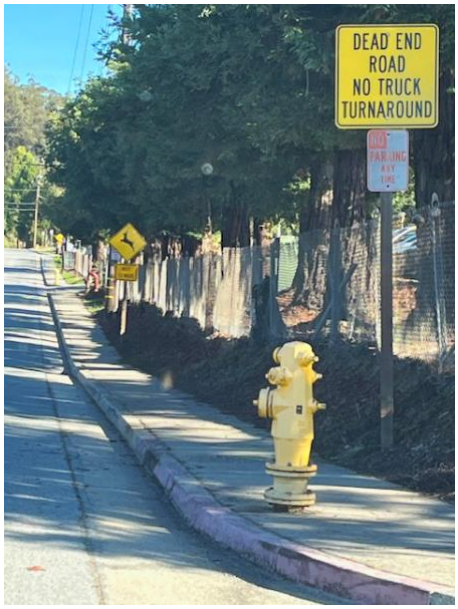
Exhibit N

5. **Inadequate turnaround space for fire vehicles.** The proposed project does not include the normal amount of space or turnaround to accommodate fire vehicles in case of a fire, or other emergency. Paul Sweet Road is simply not capable of accommodating large fire vehicles. The proposed tenement building takes up most of the ½ acre site, leaving no fire truck access to the rear and sides of their building.
6. **Paul Sweet Road is unsafe for delivery and or storage of construction materials** to create forms for the concrete structure proposed for the parking facility.
7. **Paul Sweet Road is unsafe for concrete delivery trucks** that needed to create the parking facility.
8. **Paul Sweet Road unsafe for the location of a project office** structure typically used on major construction projects, due to its tiny ½ acre site.
9. **Paul Sweet Road is unsafe for parking of construction staff vehicles**; There is no parking permitted at any time on the east side of Paul Sweet Road and there is no parking from midnight to 6 AM on the west side of Paul Sweet Road. There are so many vehicles already parking on the west side of Paul Sweet Road, that there are rarely any available on street parking spaces at all.
10. **Paul Sweet Road is unsafe for the large vehicles** needed to deliver the prefabricated units.
11. **Paul Sweet Road is unsafe for a large crane** needed to install the prefabricated units.
12. **The proposed excavation will create huge amounts of dust** creating unmitigable adverse impacts on the approximately 225 residents and numerous employees of Dominican Oaks. The apartments at Dominican Oaks have no air conditioning or air filters. Temperatures in the apartments are controlled by opening and closing the window and sliding doors. In addition, three meals are prepared for and consumed by the residents of Dominican Oaks each day in spaces that again commonly open windows and doors for ventilation.
13. **Pollution from airborne particles created during construction** of 3500 PSR presents health risks to Dominican Oaks residents who have COPD, require oxygen or have other compromised lung conditions.
14. **Unmitigable adverse impact from excessive noise generation**. The proposed excavation will create unmitigable adverse impact on the approximately 225 residents and over 100 employees of Dominican Oaks due to noise generation throughout the construction period and thereafter when residents occupy the 105 residential units proposed.
15. **Grossly inadequate parking**. This project includes grossly inadequate parking for the planned occupants of the building. Only 70 parking spaces are planned for potentially 175 residents, most of whom will have and use cars. This will generate significant additional traffic from the residents as well as on demand rides, and delivery of goods, products and services to the building and the residents. Again, Paul Sweet Road is not capable of accommodating large vehicle such as buses or large delivery trucks.
16. **No bicycle lanes on Paul Sweet Road in either direction**. Paul Sweet Road is too narrow to accommodate bike lanes in either direction because the road is classified as Type III, stipulating that bicyclists haven to share the vehicle travel zone with cars, trucks and other vehicles. This is dangerous for vehicle drivers as well as bicyclists.

Exhibit N

17. **No Sidewalks on one side, non-compliant sidewalk on other.** There is no sidewalk on the west side of Paul Sweet Road and only one sidewalk on the east side of Paul Sweet Road. This east sidewalk is not in compliance with Santa Cruz regulations because at only 4' wide. It does not meet the minimum standards of a 6' width.

18. **Paul Sweet Road is unsafe for use by large construction vehicles needed to excavate the site** to street elevation as proposed. The application states over 10,500 cubic yards would be removed from the site. Paul Sweet Road is posted "Dead End Road" and no truck turn around.



19. **Increased traffic congestion and delays.** Workbench has submitted a deeply flawed "traffic study" asserting that the addition of this huge tenement building will only delay traffic on Paul Sweet Road by a couple seconds. Traffic is already backed up at Paul Sweet Road and Soquel Drive. There is a 3-way traffic light at that intersection, shared with Soquel Drive, the Northbound exit from Highway 1 at Soquel Drive and Paul Sweet Road. Timing for the light is much longer for Soquel Drive and the Highway 1 exit ramp than for Paul Sweet Road. Today, only a few cars can exit Paul Sweet Drive at each light cycle. Cars are often so backed up, that it takes 3 – 4 light cycles to exit Paul Sweet Road. This project will create even longer delays.

20. **Strain on existing infrastructure** such as water, electricity, and sewage will be created by this project. Santa Cruz County already faces existing water resource issues, including concerns about groundwater collection and potential saltwater intrusion into wells. New high-density housing projects, such as 3500 Paul Sweet Road will exacerbate these problems by increasing demand on already strained water systems. Developers are often required to conduct hydrological studies and fund new water infrastructure to mitigate these impacts. It appears that Workbench has not conducted any such studies. Nor have they addressed sewage and electricity concerns.

21. **Family members of Dominican Oaks Residents are opposed** to the 3500 Paul Sweet Road project because of the potential health and safety dangers from this project to their loved ones who live here.

Exhibit N

Jonathan DiSalvo

From: Suzanne Ise
Sent: Wednesday, November 12, 2025 11:00 AM
To: Jonathan DiSalvo; Tiffany Martinez; Stephanie Hansen; Donovan Arteaga; Jocelyn Drake
Cc: Porcila Wilson
Subject: FW: 3500 reasons why 3500 Paul Sweet Road should never be built
Attachments: 3500 reasons why 11-11 edit.pdf

FYI

Regards,

Suzanne Ise'
Principal Planner
CDI Planning Division
Housing Section
(831) 454-2332

From: Virginia Lieb <virginia@lieb.com>
Sent: Wednesday, November 12, 2025 10:55 AM
To: s.pavonetti@gmail.com; rizcon@earthlink.net; jessenickell3art@gmail.com; janerbarr@aol.com; Trina Barton <Trina.Barton@santacruzcountyca.gov>; Sandy Brown <Sandy.Brown@santacruzcountyca.gov>; yeseniajduran@gmail.com; kami@davidlyng.com; renee@reneesgarden.com; jagomez173@gmail.com; Jamie Sehorn <Jamie.Sehorn@santacruzcountyca.gov>; Suzanne Ise <Suzanne.Ise@santacruzcountyca.gov>; housing@hacosantacruz.org; .Adam.Spickler@santacruzcounty.us
Subject: 3500 reasons why 3500 Paul Sweet Road should never be built

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Dear members of the Santa Cruz County Planning Commission, Housing Advisory Commission and the Board of Supervisors,

"Sweet Homes" at 3500 Paul Sweet Road ts an egregious and dangerous project. Many in the community have legitimate health and safety issues with this project. We have prepared for you the following document that explains the many problems of this project.

As you approach your decision making on this project, please give sufficient weight to the grave health and safety risks this project would create for thousands of your constituents,

Thank you.

Exhibit N

Virginia W Lieb
Dominican Oaks
3400 Paul Sweet Rd., Unit C-213
484-678-8301
Virginia@Lieb.com

3500 Reasons Why 3500 Paul Sweet Rd Should Never Be Built

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230	Employees of Chaminade
200	Restaurant guests at Chaminade
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Exhibit N

assistance to evacuate during a fire or other emergency. This project could significantly delay or block the ability of residents and emergency vehicles to reach the hospital quickly, resulting in the difference between life and death. Protecting clear, prompt and reliable access to medical care should remain a priority for planning decisions in our area.

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17.

Exhibit N

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Exhibit N

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21. **Family members of Dominican Oaks Residents are opposed** to the 3500 Paul Sweet Road project because of the potential health and safety dangers from this project to their loved ones who live here.

Exhibit N

To the Santa Cruz County Planning Commission:

There are many reasons why the Workbench proposal to build a six-story project next door to Dominican Oaks is a bad idea. Have all the commissioners seen the very small property on Paul Sweet Road?

I would like my written concerns to be included in the packets of information presented to the commissioners at their next meeting.

I believe that the commissioners should vote NO on this project.

Sincerely,

Vivienne Andres
Dominican Oaks #C218

Exhibit N

Donovan Arteaga

From: judy warner <warnerjudy100@gmail.com>
Sent: Monday, December 15, 2025 12:57 PM
To: Jonathan DiSalvo; Donovan Arteaga; First.district@santacruzca.gov; s.pavonetti@gmail.com; Jessenickell3art@gmail.com; Trina Barton; yeseniajduran@gmail.com; renee@reneesgarden.com; Second District; Justin Cummings; Felipe Hernandez; Fifth District; Sandy Brown

Subject: Proposed Apartments for 3500 Paul Sweet Road, Santa Cruz CA

Follow Up Flag: Follow up
Flag Status: Flagged

****CAUTION:**This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Santa Cruz County Planning Commission
Santa Cruz County Board of Supervisors

Dear People,

I add my voice to others in opposing the proposed project at 3500 Paul Sweet Road and ask you to vote NO.

During the design process, builders of new construction housing are expected to make reasonable accommodations for the rights of disabled neighbors. The developer has made none for the senior community next door with respect to access to safety during emergencies and to daily life activities. Accessible entrances from Paul Sweet Road and vicinity must always be kept clear and open for evacuations and daily living needs.

Where I am, the Dominican Oaks Senior Community, there are many of us independent-living residents with one or more disabilities that affect eyesight, hearing, breathing, or the ability to make quick decisions and communicate clearly. Many of us have arthritis or issues of the muscular-skeletal system. More

Exhibit N

than a few of us also have mobility made possible only by walkers, wheelchairs, or canes. Assisted living residents are those who need more care, often around the clock. Whether temporary or permanent, all of us here are protected by the Americans with Disabilities Act. Rights for the disabled are Civil Rights.

Members of the Planning Commission and Board of Supervisors, you share a problem with us--we're all sandwiched between a Housing Element and Builder's Remedy. What started out as the means to a good end has taken us away from local knowledge, wisdom, and the reality check for decision making.

Please vote NO on 3500, and begin working with community and colleagues state-wide at every level of government to end the Builder's Remedy. It's time to take back your power to represent your constituents.

Judy H. Warner
3400 Paul Sweet Road
Santa Cruz, CA 95065

Exhibit N

Donovan Arteaga

From: judy warner <warnerjudy100@gmail.com>
Sent: Thursday, December 18, 2025 10:11 AM
To: Jonathan DiSalvo
Cc: Donovan Arteaga
Subject: PLANNING COMMISSION MEETING FOR 3500 PAUL SWEET ROAD

Follow Up Flag: Follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Members of the Planning Commission, we share a problem with you--we're sandwiched between a Housing Element and Builder's Remedy. What started out as the means to a good end has taken us away from local knowledge, wisdom, and the reality check for decision making.

Where I am, the Dominican Oaks Senior Community, there are many of us independent-living residents with one or more disabilities that affect eyesight, hearing, breathing, or the ability to make quick decisions and communicate clearly. Many of us have arthritis or issues of the muscular-skeletal system.

More than a few of us also have mobility made possible only by walkers, wheelchairs, or canes. Assisted-living residents are those who need more care, often around the clock. Whether temporary or permanent, all of us here are protected by the Americans with Disabilities Act. Rights for the disabled are Civil Rights.

During the design process, builders of new-construction housing are expected to make reasonable accommodations for the rights of disabled neighbors. The developer has made none for the senior community next door with respect to access to

Exhibit N

safety during emergencies and to daily life activities. Accessible entrances from Paul Sweet Road and vicinity must always be kept clear and open for evacuations and daily living needs.

Please vote NO on 3500, and begin working with community and colleagues state-wide to end the Builder's Remedy. It's time to take back your power to represent your constituents.

I would appreciate your adding my comments to the County Planning Commission folders for the appropriate meeting.

Judy H. Warner
3400 Paul Sweet Road
Santa Cruz, CA 95065

Exhibit N

Donovan Arteaga

From: Virginia Lieb <virginia@lieb.com>
Sent: Thursday, October 30, 2025 11:55 AM
To: Donovan Arteaga
Cc: Jamie Sehorn
Subject: Please include my letter as part of the public record about the 'Sweet Homes" ptenement roject

Follow Up Flag: Follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Dear Mr. Artega,

Jamie Sehorn asked me to send you my following letter about the "Sweet Homes" tenement project at 3500 Paul Sweet Road. I recently sent this letter to Manu Koenig, the other members of the Santa Cruz County Board of Supervisors and the members of the County of Santa Cruz Planning Commission.

Please include my letter as part of the public record once the 'Sweet Homes" project is agendized for one of the upcoming Planning Commission Meetings. Also, please let me know once the 'Sweet Homes" project has been placed on the meeting agenda. Also, please let me know which date the "Sweet Homes" project will be on the agenda, November 12 or November 26.

Thank you for your time and consideration

Virginia W Lieb
3400 Paul Sweet Road, Unit C-213
Santa Cruz, CA 95065
484-678-8301
virginia@lieb.com

Begin forwarded message:

From: Virginia Lieb <virginia@lieb.com>
Subject: Proposed Sweet Homes project is a health and safety hazard and does not conform to federal FAA regulations

Exhibit N

Date: October 24, 2025 at 1:06:54 PM PDT
To: Manu.Koenig@santacruzcountyca.gov
Cc: Second.District@santacruzcountyca.gov, justin.cummings@santacruzcountyca.gov, felipe.hernandez@santacruzcountyca.gov, Fifth.District@santacruzcountyca.gov, s.pavonetti@gmail.com, rizcon@earthlink.net, jessenickell3art@gmail.com, janerbarr@aol.com, Trina.Barton@santacruzcountyca.gov, Sandy.Brown@santacruzcountyca.gov, yeseniajduran@gmail.com, kami@davidlyng.com, renee@reneesgarden.com, jagomez173@gmail.com, Jamie Sehorn <Jamie.Sehorn@santacruzcountyca.gov>

Dear Supervisor Koenig,

3500 PSR poses Health and Safety Hazards:

As a resident of Dominican Oaks, I am deeply concerned about the dangers of the proposed "Sweet Homes" tenement project at 3500 Paul Sweet Road. Increased traffic, construction that would limit road access, and the increased competition for parking could significantly delay or block the ability of residents and emergency vehicles to reach Dominican Hospital quickly in times of crisis. Even a few minutes of delay can mean the difference between life and death. Protecting clear and reliable access to medical care should remain a priority for planning decisions in our area.

Paul Sweet Road is a dead end road and the only evacuation route for our community and surrounding homes and businesses. Dominican Oaks has over 200 senior residents, many of whom move slowly or need assistance. During a wildfire or other disaster, safe and timely evacuation is critical. Adding hundreds of cars from this new project, especially while the project is under construction, would create gridlock at the very moment when every second counts. It will also impede any efforts for emergency vehicles to respond to events at either our complex, neighboring homes and businesses. or the project being proposed.

3500 PSR does not conform to Federal FAA Regulations:

At 82 feet in height, this proposed project it is located only 834 feet from the hospital helipad at Dominican Hospital. This greatly exceeds the FAA height limit for buildings near a helipad. To conform to FAA regulations, the maximum height of the 3500 Paul Sweet Road temement project is limited to a maximum height of 33 feet. This allows for a building of only 3 stories.

The county's April 3, 2025 letter to Workbench stated "*It is noted a heliport / EMS landing site is located nearby the project site at Dominican Hospital. It is*

Exhibit N

recommended you confirm the proposed building would conform to any applicable State and Federal regulations governing land use compatibility with the heliport". To date, it appears that Workbench has still not filed a completed FAA Form 7460–1, Notice of Proposed Construction. Please request that Workbench file their proposal for this project with the FAA without further delay.

I understand the need for more housing in Santa Cruz County. Dominican Oaks already contributes to that effort by serving as the only affordable senior housing program in the County. But this particular project is not the right fit for this location. It jeopardizes emergency access, evacuation safety, and the wellbeing of hundreds of vulnerable seniors.

I respectfully urge you to reject this proposal and protect the safety and quality of life for Dominican Oaks residents and the broader community.

Thank you for your time and consideration.

Sincerely,

Virginia W. Lieb
3400 Paul Sweet Road, Unit C-213
Santa Cruz, CA 95065
484-678-8301

Exhibit N

Donovan Arteaga

From: Suzanne Ise
Sent: Wednesday, November 12, 2025 11:00 AM
To: Jonathan DiSalvo; Tiffany Martinez; Stephanie Hansen; Donovan Arteaga; Jocelyn Drake
Cc: Porcila Wilson
Subject: FW: 3500 reasons why 3500 Paul Sweet Road should never be built
Attachments: 3500 reasons why 11-11 edit.pdf

FYI

Regards,

Suzanne Ise'
Principal Planner
CDI Planning Division
Housing Section
(831) 454-2332

From: Virginia Lieb <virginia@lieb.com>
Sent: Wednesday, November 12, 2025 10:55 AM
To: s.pavonetti@gmail.com; rizcon@earthlink.net; jessenickell3art@gmail.com; janerbarr@aol.com; Trina Barton <Trina.Barton@santacruzcountyca.gov>; Sandy Brown <Sandy.Brown@santacruzcountyca.gov>; yeseniajduran@gmail.com; kami@davidlyng.com; renee@reneesgarden.com; jagomez173@gmail.com; Jamie Sehorn <Jamie.Sehorn@santacruzcountyca.gov>; Suzanne Ise <Suzanne.Ise@santacruzcountyca.gov>; housing@hacosantacruz.org; .Adam.Spickler@santacruzcounty.us
Subject: 3500 reasons why 3500 Paul Sweet Road should never be built

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Dear members of the Santa Cruz County Planning Commission, Housing Advisory Commission and the Board of Supervisors,

"Sweet Homes" at 3500 Paul Sweet Road ts an egregious and dangerous project. Many in the community have legitimate health and safety issues with this project. We have prepared for you the following document that explains the many problems of this project.

As you approach your decision making on this project, please give sufficient weight to the grave health and safety risks this project would create for thousands of your constituents,

Thank you.

Exhibit N

Virginia W Lieb
Dominican Oaks
3400 Paul Sweet Rd., Unit C-213
484-678-8301
Virginia@Lieb.com

3500 Reasons Why 3500 Paul Sweet Rd Should Never Be Built

Quantity	Health/Safety risks & the people & businesses these risks endanger
246	Patients at Dominican Hospital
230	Employees of Chaminade
200	Restaurant guests at Chaminade
155	Overnight guests at Chaminade
225	Residents of Dominican Oaks
250	Family members of Dominican Oaks residents
125	Staff at Dominican Oaks
35	Other property owners on Paul Sweet Road, Lupine Lane, Dempsey Rd
55	Employees of AMR (American Medical Response)
58	Employees of City of Santa Cruz Fire Department
1900	Employees of Dominican Hospital
21	Health and safety dangers (listed below)

3500	Total

At the proposed site, the 3500 Paul Sweet Road, project does pose several specific, unmitigable health and safety risks. No amount of additional data development would address or resolve the following 21 issues:

1. **3500 Project impacts ambulance response times.** Current data shows that ambulances are only meeting their 15-minute response time metric for heart attack and stroke patients 50% of the time. Increased traffic from this project will create bottlenecks on Paul Sweet Road, only worsening ambulance response times.
2. **3500 Project is in violation of FAA regulations for height of buildings near heliports**. Our neighbor, Dominican Hospital, has an active heliport. Yet this project does not conform to FAA regulations for building height near a helipad. At 82 feet in height, this proposed project is located only 834 feet from the hospital helipad. This greatly exceeds the FAA height limit for buildings near a helipad. To conform to FAA regulations, the height of the 3500 Paul Sweet Road project is limited to a maximum height of 33 feet. As of now, it appears that Workbench has not filed FAA Form 7460–1, despite repeated requests to do so.
3. **Paul Sweet Road is the only evacuation route** for Dominican Oaks as well as other surrounding residences and businesses. Adding hundreds of additional cars from this new project will create gridlock on this dead-end street that is so narrow, that trucks and fire engines cannot turn around. This ill-conceived project will turn that sole lifeline into a deadly bottleneck.
4. **3500 Project endangers timely evacuation in life-or-death emergencies**. Senior residents at Dominican Oaks move more slowly using canes, walkers or wheelchairs. This requires more time and

Exhibit N

assistance to evacuate during a fire or other emergency. This project could significantly delay or block the ability of residents and emergency vehicles to reach the hospital quickly, resulting in the difference between life and death. Protecting clear, prompt and reliable access to medical care should remain a priority for planning decisions in our area.

5. **Inadequate turnaround space for fire vehicles.** The proposed project does not include the normal amount of space or turnaround to accommodate fire vehicles in case of a fire, or other emergency. Paul Sweet Road is simply not capable of accommodating large fire vehicles. The proposed tenement building takes up most of the ½ acre site, leaving no fire truck access to the rear and sides of their building.
6. **Paul Sweet Road is unsafe for delivery and or storage of construction materials** to create forms for the concrete structure proposed for the parking facility.
7. **Paul Sweet Road is unsafe for concrete delivery trucks** that needed to create the parking facility.
8. **Paul Sweet Road unsafe for the location of a project office** structure typically used on major construction projects, due to its tiny ½ acre site.
9. **Paul Sweet Road is unsafe for parking of construction staff vehicles**; There is no parking permitted at any time on the east side of Paul Sweet Road and there is no parking from midnight to 6 AM on the west side of Paul Sweet Road. There are so many vehicles already parking on the west side of Paul Sweet Road, that there are rarely any available on street parking spaces at all.
10. **Paul Sweet Road is unsafe for the large vehicles** needed to deliver the prefabricated units.
11. **Paul Sweet Road is unsafe for a large crane** needed to install the prefabricated units.
12. **The proposed excavation will create huge amounts of dust** creating unmitigable adverse impacts on the approximately 225 residents and numerous employees of Dominican Oaks. The apartments at Dominican Oaks have no air conditioning or air filters. Temperatures in the apartments are controlled by opening and closing the window and sliding doors. In addition, three meals are prepared for and consumed by the residents of Dominican Oaks each day in spaces that again commonly open windows and doors for ventilation.
13. **Pollution from airborne particles created during construction** of 3500 PSR presents health risks to Dominican Oaks residents who have COPD, require oxygen or have other compromised lung conditions.
14. **Unmitigable adverse impact from excessive noise generation**. The proposed excavation will create unmitigable adverse impact on the approximately 225 residents and over 100 employees of Dominican Oaks due to noise generation throughout the construction period and thereafter when residents occupy the 105 residential units proposed.
15. **Grossly inadequate parking**. This project includes grossly inadequate parking for the planned occupants of the building. Only 70 parking spaces are planned for potentially 175 residents, most of whom will have and use cars. This will generate significant additional traffic from the residents as well as on demand rides, and delivery of goods, products and services to the building and the residents. Again, Paul Sweet Road is not capable of accommodating large vehicle such as buses or large delivery trucks.
16. **No bicycle lanes on Paul Sweet Road in either direction**. Paul Sweet Road is too narrow to accommodate bike lanes in either direction because the road is classified as Type III, stipulating that bicyclists haven to share the vehicle travel zone with cars, trucks and other vehicles. This is dangerous for vehicle drivers as well as bicyclists.
17.

Exhibit N

No Sidewalks on one side, non-compliant sidewalk on other. There is no sidewalk on the west side of Paul Sweet Road and only one sidewalk on the east side of Paul Sweet Road. This east sidewalk is not in compliance with Santa Cruz regulations because at only 4' wide. It does not meet the minimum standards of a 6' width.

18. **Paul Sweet Road is unsafe for use by large construction vehicles needed to excavate the site** to street elevation as proposed. The application states over 10,500 cubic yards would be removed from the site. Paul Sweet Road is posted "Dead End Road" and no truck turn around.

19. **Increased traffic congestion and delays.** Workbench has submitted a deeply flawed "traffic study" asserting that the addition of this huge tenement building will only delay traffic on Paul Sweet Road by a couple seconds. Traffic is already backed up at Paul Sweet Road and Soquel Drive. There is a 3-way traffic light at that intersection, shared with Soquel Drive, the Northbound exit from Highway 1 at Soquel Drive and Paul Sweet Road. Timing for the light is much longer for Soquel Drive and the Highway 1 exit ramp than for Paul Sweet Road. Today, only a few cars can exit Paul Sweet Drive at each light cycle. Cars are often so backed up, that it takes 3 – 4 light cycles to exit Paul Sweet Road. This project will create even longer delays.

Exhibit N

20. **Strain on existing infrastructure** such as water, electricity, and sewage will be created by this project. Santa Cruz County already faces existing water resource issues, including concerns about groundwater collection and potential saltwater intrusion into wells. New high-density housing projects, such as 3500 Paul Sweet Road will exacerbate these problems by increasing demand on already strained water systems. Developers are often required to conduct hydrological studies and fund new water infrastructure to mitigate these impacts. It appears that Workbench has not conducted any such studies. Nor have they addressed sewage and electricity concerns.
21. **Family members of Dominican Oaks Residents are opposed** to the 3500 Paul Sweet Road project because of the potential health and safety dangers from this project to their loved ones who live here.

Exhibit N

3500 Reasons Why 3500 Paul Sweet Rd Should Never Be Built

Quantity	Health/Safety risks & the people & businesses these risks endanger
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Exhibit N

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15. **Grossly inadequate parking**. This project includes grossly inadequate parking for the planned occupants of the building. Only 70 parking spaces are planned for potentially 175 residents, most of whom will have and use cars. This will generate significant additional traffic from the residents as well as on demand rides, and delivery of goods, products and services to the building and the residents. Again, Paul Sweet Road is not capable of accommodating large vehicle such as buses or large delivery trucks.
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Exhibit N

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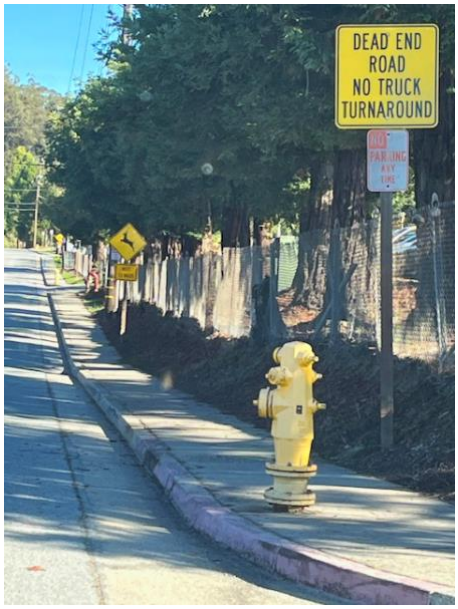

19. **Increased traffic congestion and delays.** Workbench has submitted a deeply flawed "traffic study" asserting that the addition of this huge tenement building will only delay traffic on Paul Sweet Road by a couple seconds. Traffic is already backed up at Paul Sweet Road and Soquel Drive. There is a 3-way traffic light at that intersection, shared with Soquel Drive, the Northbound exit from Highway 1 at Soquel Drive and Paul Sweet Road. Timing for the light is much longer for Soquel Drive and the Highway 1 exit ramp than for Paul Sweet Road. Today, only a few cars can exit Paul Sweet Drive at each light cycle. Cars are often so backed up, that it takes 3 – 4 light cycles to exit Paul Sweet Road. This project will create even longer delays.

20. **Strain on existing infrastructure** such as water, electricity, and sewage will be created by this project. Santa Cruz County already faces existing water resource issues, including concerns about groundwater collection and potential saltwater intrusion into wells. New high-density housing projects, such as 3500 Paul Sweet Road will exacerbate these problems by increasing demand on already strained water systems. Developers are often required to conduct hydrological studies and fund new water infrastructure to mitigate these impacts. It appears that Workbench has not conducted any such studies. Nor have they addressed sewage and electricity concerns.

21. **Family members of Dominican Oaks Residents are opposed** to the 3500 Paul Sweet Road project because of the potential health and safety dangers from this project to their loved ones who live here.

Exhibit N

November 16, 2025

To: Trina Barton, Chair, Santa Cruz County Planning Commission

From: Margit Aramburu, Dominican Oaks resident

Subject: Comments on 3500 Paul Sweet Road Proposed Project; Application #241360

My understanding is that currently in California, a county can only turn down a "Builder's Remedy" project under very narrow and specific circumstances. A county may be able to reject or delay such a project if it poses ***a specific, unmitigable health or safety risk***.

While the proposed project is creative and interesting, at the proposed site, the proposed project does pose several specific, unmitigable health and safety risks. No amount of additional data development would address or resolve the following issues:

Paul Sweet Road is unsafe for use by large construction vehicles needed to excavate the site to street elevation as proposed. Paul Sweet Road is posted no exit and no truck turn around. The application states over 10,500 cubic yards would be removed from the site.

Paul Sweet Road is unsafe for delivery and or storage of construction materials needed to create forms for the concrete structure proposed for the parking facility.

Paul Sweet Road is unsafe for location of concrete delivery trucks would be needed to create the parking facility.

Paul Sweet Road is unsafe for location of a project office structure typically used on major construction projects, due to its narrow width.

Paul Sweet Road is unsafe for parking of construction staff vehicles; parking is only allowed on one side of the road and only during daylight hours. There are no available on street parking spaces under current uses.

Paul Sweet Road is unsafe for the large vehicles that will be needed to deliver the prefabricated units.

Paul Sweet Road is unsafe for a large crane that will be needed to install the prefabricated units.

In addition, the proposed excavation will create unmitigable adverse impacts on the approximately 225 residents and numerous employees of Dominican Oaks due to creation of dust; the units have no air conditioning or air filters and temperatures in the units are largely controlled by opening and closing the window and sliding doors. In addition, three meals a day are prepared, served, and consumed each day at Dominican Oaks in spaces that again commonly open windows and doors for ventilation.

Exhibit N

In addition, the proposed excavation will create unmitigable adverse impacts on the approximately 225 residents and numerous employees of Dominican Oaks due to noise generation throughout the construction period and thereafter when residents occupy the many residential units proposed at 3500 Paul Sweet Road.

In addition, the proposed project includes very limited parking and may generate traffic in the form of on demand rides, and/or delivery of goods, products and services to the building and the residents. Again, Paul Sweet Road is not capable of accommodating large vehicle such as buses, or large delivery trucks, nor are there bike lanes.

In addition, the proposed project does not include normal amount of space or turnaround to accommodate fire vehicles in case of a fire, or other emergency. Paul Sweet Road is not capable of accommodating large fire vehicles. While the applicants appear to propose access to the Dominican Oaks driveway and fire road to meet fire truck access to the rear and sides of the building, any such proposed would put Dominican Oaks structures and tenants in danger during an emergency situation and should be preserved only for use by Dominican Oaks.

In summary, I recommend denial of the proposed project based on its unmitigable health and safety risks to the residents of Dominican Oaks, and to any potential residents if the proposed project if built as currently proposed.

Margit Aramburu

3400 Paul Sweet Road, Unit A310

Santa Cruz, CA 95065

Cc: Donovan Arteaga, Planning Division

Jonathan DiSalvo, Senior Planner

Supervisor Manu Koenig, District 1

Exhibit N

Arlie Takahashi
Unit A303
3400 Paul Sweet Rd
Santa Cruz, CA 95065-1549

SAN JOSE CA 950

3 DEC 2025 PM 1 L

1775 2025 FREEDOM FOREVER/USA

RECEIVED
CDI - Planning
DEC 5 2025
County of Santa Cruz

The Santa Cruz County Planning Commission
County Government Center
701 Ocean Street, Room 420
Santa Cruz, CA 95060

Exhibit N

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CDI - Planning
DEC 5 2025
County of Santa Cruz

Dominican Oaks
3400 Paul Sweet Rd. Apt. 303
Santa Cruz, CA 95065
Dec 2, 2025

The Santa Cruz County Planning Commission
County Government Center
701 Ocean Street, Room 420
Santa Cruz, CA 95060

Re: Proposed 6 story apt building next to Senior Residence, Dominican Oaks.

Dear Commission Member,

I am an 88 year old resident of Dominican Oaks. I am now being helped by a certified care-giver. There is no room for the cars of these care-givers. They park on the side of the road to work here. The care-giver is vital to the functioning of this vital non-profit senior residence. Cars parked on the side of the road by residence or visitors to a 6 story apartment building could really mess up this vital service!

There are many more reasons for voting NO on building a 6 story apartment building at this location. But this may not be mentioned by others & it is very important to myself & others.

Sincerely yours,
Chiu Takahashi

Exhibit N

Exhibit N

Helen V. Andres
3400 Paul Sweet Rd Unit C218
Santa Cruz, CA 95065

SAN JOSE CA 950
3 DEC 2025 PM 1 L

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CDI - Planning
DEC 8 2025
County of Santa Cruz

The Santa Cruz County
Planning Commission
County Government Center
701 Ocean Street, Room 420
SANTA CRUZ, CA 95060

95060-401430

Exhibit N

Exhibit N

Donovan Arteaga

From: Suzanne Ise
Sent: Friday, December 12, 2025 2:47 PM
To: Donovan Arteaga; Elizabeth Padilla
Cc: Jonathan DiSalvo
Subject: FW: Multiple legitimate reasons to deny approval of the project at 3500 Paul Sweet Road.

Hi Donovan & Elizabeth,
I think this email may need to be attached as Written Communication to the next PC and BOS agendas, as it appears to have been sent to the entire PC and Board.

Regards,

Suzanne Ise'
Principal Planner
CDI Planning Division
Housing Section
(831) 454-2332

From: Virginia Lieb <virginia@lieb.com>
Sent: Friday, December 12, 2025 11:59 AM
To: s.pavonetti@gmail.com; rizcon@earthlink.net; Jesse Nickell <jessenickell3art@gmail.com>; janerbarr@aol.com; Trina Barton <Trina.Barton@santacruzcountyca.gov>; Sandy Brown <Sandy.Brown@santacruzcountyca.gov>; yeseniajduran@gmail.com; kami@davidlyng.com; renee@reneesgarden.com; jagomez173@gmail.com; Jamie Sehorn <Jamie.Sehorn@santacruzcountyca.gov>; Suzanne Ise <Suzanne.Ise@santacruzcountyca.gov>; housing@hacosantacruz.org; Jonathan DiSalvo <Jonathan.DiSalvo@santacruzcountyca.gov>; Manu Koenig <Manu.Koenig@santacruzcountyca.gov>; Second District <Second.District@santacruzcountyca.gov>; Justin Cummings <Justin.Cummings@santacruzcountyca.gov>; Felipe Hernandez <Felipe.Hernandez@santacruzcountyca.gov>; Fifth District <Fifth.District@santacruzcountyca.gov>
Subject: Multiple legitimate reasons to deny approval of the project at 3500 Paul Sweet Road.

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

To all Supervisors and members of the Planning Commission:

This lengthy letter addresses multiple legitimate reasons to deny approval of the project at 3500 Paul Sweet Road. Before you decide on the fate of this project, please review and consider all this information:

Santa Cruz County can deny or condition Builder's Remedy projects under specific circumstances outlined in state law:

Exhibit N

1. The housing project pose an unmitigable, adverse impact on public health or safety.

2. The denial or condition is required to meet state or federal law, and there is no feasible method to comply without making the development unaffordable.

Source:
https://cdi.santacruzcountyca.gov/UPC/GetInvolved/MajorProjectApplications/BuildersRemedy.aspx#:~:text=To%20address%20the%20statewide%20housing,without%20making%20the%20development%20unaffordable.

The following are just some of the many conditions under which denying approval is legal:

1. Public Health & Safety Impacts

a) Evacuation and firefighting dangers

- Bryan Gage - Battalion Chief, City of Greenfield Fire Dept. analyzed and made the following statement Regarding the 3500 PSR Proposal.

- Evacuation Challenges: Bryan's review of the site plan indicates that the proposed development offers no viable solution for area evacuation. This deficiency would directly compromise life safety during an emergency for Dominican Oaks, Dominican Hospital, and the surrounding areas.

- Proximity and Collapse Zone Risk: The proposed development's close proximity to Dominican Oaks places Dominican Oaks within a "collapse zone" during a catastrophic emergency. This significantly amplifies the existing life safety concerns associated with the site.

- Fire Apparatus Access and Operations:
  - In Bryan's professional opinion, a fire apparatus responding to either the proposed development or Dominican Oaks would severely impede access for other emergency vehicles needed for evacuation or medical care.
  - Furthermore, he advises against positioning a fire truck between the proposed development and Dominican Oaks due to its location within the collapse zone, which would expose the emergency response team to unacceptable risk.

B)_ No Fire Review from Central Fire District

- Workbench claims that Central Fire has completed its review and that all compliance items have been resolved. On December 3, we asked your office to provide us with a copy of the fire

Exhibit N

review and if any compliance items remain, please provide them. We have not received this fire review.

- In the June 13, 2025 *County of Santa Cruz Complete Application Submittal* there is no mention of the Fire Review.

c) Chip Bogaard addresses health & safety issues

- Mr. Chip Bogaard, with over 40 years of experience in the construction industry submitted a letter regarding the proposed development at 3500 Paul Sweet Road, adjacent to Dominican Hospital and Dominican Oaks. His analysis raises several critical life-safety and infrastructure concerns that deserve careful consideration before any decision is made on this project.

- Dominican Hospital and Dominican Oaks serve as essential pillars of the Santa Cruz community, providing acute-care services, long-term support, and a safe living environment for some of our most vulnerable residents. Any development in close proximity to these facilities must be designed with the highest standards of safety, compatibility, and operational independence.

- Mr. Bogaard identifies several key issues in the current proposal:

- **Emergency access and egress risks**, including fire-apparatus staging that would block Dominican Oaks' only driveway—compromising evacuation capability for seniors with mobility limitations.

- **Intended use of Dominican Oaks' private fire hydrant and water system**, which poses unresolved engineering and operational risks and could impact fire-flow availability for the facility.

- **Severe fire-exposure concerns** due to the proposed 82-foot structure being built right next to the property line, creating significant radiant-heat, debris, and evacuation hazards.

- **A building mass vastly out of scale** with the surrounding healthcare and senior-living environment, directly affecting safety, emergency response, and neighborhood character.

- **Inappropriate reliance on Dominican Oaks' private property and infrastructure**, which Dominican Oaks is not obligated—and cannot safely be expected—to support.

- Mr. Bogaard calls for a responsibly designed project that protects current residents, aligns with local infrastructure capacity, and maintains the safety and operational integrity of Dominican Hospital and Dominican Oaks.

Exhibit N

d) Health & Safety issues during Construction of 3500 PSR

- Seniors can request reasonable accommodations from the County to mitigate negative impacts (e.g., noise, dust, blocked access during construction) on their ability to live in their own homes, even if those homes aren't part of the project. If the project creates barriers to accessing their homes or public spaces, it endangers the safety and health of residents next door.

2. 3500 PSR Not meeting state or federal laws.

a) <u>FAA height requirements of buildings near Heliports</u>.

- Section 1.11 of the FAA AC states that Notice under Part 77 is required if building top will penetrate the <u>25:1 </u>surface.
- 25:1 surface applies up to 5,000 ft from heliport
- 3500 PSR is 834 feet from helipad, thus a height of 33 feet (3 stories) is the maximum height allowed for this project.
- FAA presumes this project to be hazardous to air navigation unless an FAA study determines otherwise.

b) ADA (Americans with Disabilities Act)

Senior disabled people in a retirement facility are protected under federal disability and housing laws, and a builder's actions creating dangerous conditions may violate these laws. The key laws that apply are under Title III of the Americans with Disabilities Act (ADA).

- Protection against Dangerous Conditions: If a builder's actions, such as construction next door, create hazardous conditions that disproportionately endanger disabled seniors (e.g., blocking accessible routes or creating excessive noise/vibration/airborne dust and pollution that impacts health conditions), this could be considered a failure to provide equal access or a failure to make reasonable accommodations under the FHA/ADA.

- Seniors with impairments like limited mobility, vision/hearing issues, or chronic conditions are defined as individuals with disabilities under these acts and are therefore entitled to protection.

c) Dominican Oaks eligible for CEQA protection as a sensitive receptor location

Exhibit N

Sensitive receptors are places where people, especially those who are more susceptible to the effects of environmental hazards (like air pollution, noise, or safety risks), live, work, or visit. This includes:

- A retirement community providing both independent and assisted living options.
    - Houses older adults, many of whom have health conditions, use mobility aids, or require assistance (such as those in assisted living with 24/7 care staff), making them more vulnerable during emergencies.
    - Located next to a hospital, which has an active heliport, needs emergency evacuation routes.

    Due to the nature of its residents and the services it provides, Dominican Oaks is treated as a location requiring special consideration in environmental and planning decisions to ensure the safety and well-being of its vulnerable population.

d) Workbench potentially liable under elder abuse laws & can be charged with reckless endangerment

- A builder could be liable for **elder abuse and neglect** in California if their actions, such as blocking escape routes, endanger seniors. A builder's actions could lead to severe civil liability and criminal charges under elder abuse laws for creating a dangerous situation, especially when building near a senior community. The fact that the victims are vulnerable seniors in a retirement community will be a key factor in demonstrating the builder's awareness of the potential harm and the severity of their disregard for that harm.
- A builder in California can be charged with reckless endangerment of senior citizens if they willfully or negligently place an elder in a situation where their health or safety is endangered, likely leading to great bodily harm or death
- This can include actions like causing unsafe conditions that the builder knew or should have known because the victims are elder or dependent adults. Examples of such behavior include creating hazardous environments, ignoring known safety risks, or failing to take necessary precautions that could lead to injury or death.
- A builder's failure to provide adequate room for firefighting equipment is a serious building and fire code violation in California, which can be reported to local authorities. Such actions may fall under related offenses, particularly those involving elder abuse.

Exhibit N

Respectfully submitted,

Virginia Lieb

Resident, Dominican Oaks Retirement Community

484-678-8301

Virginia@Lieb.com

Exhibit N

Donovan Arteaga

From: Suzanne Ise
Sent: Friday, December 12, 2025 2:48 PM
To: Donovan Arteaga; Elizabeth Padilla
Cc: Jonathan DiSalvo
Subject: FW: Multiple legitimate reasons to deny approval of the project at 3500 Paul Sweet Road.

This too?

Regards,

Suzanne Ise'
Principal Planner
CDI Planning Division
Housing Section
(831) 454-2332

From: john weiser <jwweiser@gmail.com>
Sent: Friday, December 12, 2025 1:54 PM
To: Virginia Lieb <virginia@lieb.com>
Cc: s.pavonetti@gmail.com; rizcon@earthlink.net; Jesse Nickell <jessenickell3art@gmail.com>; janerbarr@aol.com; Trina Barton <Trina.Barton@santacruzcountyca.gov>; Sandy Brown <Sandy.Brown@santacruzcountyca.gov>; yeseniajduran@gmail.com; kami@davidlyng.com; renee@reneesgarden.com; jagomez173@gmail.com; Jamie Sehorn <Jamie.Sehorn@santacruzcountyca.gov>; Suzanne Ise <Suzanne.Ise@santacruzcountyca.gov>; housing@hacosantacruz.org; Jonathan DiSalvo <Jonathan.DiSalvo@santacruzcountyca.gov>; Manu Koenig <Manu.Koenig@santacruzcountyca.gov>; Second District <Second.District@santacruzcountyca.gov>; Justin Cummings <Justin.Cummings@santacruzcountyca.gov>; Felipe Hernandez <Felipe.Hernandez@santacruzcountyca.gov>; Fifth District <Fifth.District@santacruzcountyca.gov>
Subject: Re: Multiple legitimate reasons to deny approval of the project at 3500 Paul Sweet Road.

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Well done, Virginia.

On Fri, Dec 12, 2025 at 11:59 AM Virginia Lieb <virginia@lieb.com> wrote:

> To all Supervisors and members of the Planning Commission:

Exhibit N

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Exhibit N

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Exhibit N

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Exhibit N

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Respectfully submitted,

Virginia Lieb

Resident, Dominican Oaks Retirement Community

484-678-8301

Virginia@Lieb.com

Exhibit N

Jonathan DiSalvo

From: Lou & Mary Ellen McTamaney <lmctamaney@comcast.net>
Sent: Wednesday, December 3, 2025 7:44 PM
To: Jonathan DiSalvo
Subject: Application #: 241360; Assessor's Parcel #: 025-013-37 & 102-061-10 Fire Review / Central Fire District

Follow Up Flag: Flag for follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Jonathan DiSalvo
Planning Department
701 Ocean Street, 4th Floor
Santa Cruz, CA 95060

Hi Jonathan…

In the April 3, 2025 *County of Santa Cruz Incomplete Application - Additional Information Required Letter* it was noted that there was no response from The Central Fire District.

From Workbench's May 15, 2025 submittal:

> **Fire Review / Central Fire District**
>
> The Project design team has been corresponding and coordinating with Central Fire on the fire department review. It appears that all compliance items have been resolved. Please obtain the fire review and if any compliance items re- main, please provide them in the manner required by Gov. Code § 65589.5(j)(2) as explained above.

In the June 13, 2025 *County of Santa Cruz Complete Application Submittal* there is no mention of the Fire Review.

Has the Central Fire District's review been completed and can you provide us with a copy?

Thank you for your consideration to this matter.

Lou McTamaney, President, Residents Council

Dominican Oaks retirement Community

Exhibit N

FAA FORM 7460-1 , NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION

§ 77.9 Construction or alteration requiring notice.

If requested by the FAA, or if you propose any of the following types of construction or alteration, you must file notice with the FAA of:

(b) Any construction or alteration that exceeds an imaginary surface extending outward and upward at any of the following slopes:

(3) 25 to 1 for a horizontal distance of 5,000 ft. from the nearest point of the nearest landing and takeoff area of each heliport described in paragraph (d) of this section.

(d) Any construction or alteration on any of the following airports and heliports:

(4) An airport or heliport with at least one FAA-approved instrument approach procedure.

FAA Part 77.9 (b) (3) and FAA Part 77.9 (d) (4) apply.

Does Dominican hospital helipad have an FAA-approved instrument approach procedure?

Yes, Dominican Hospital's helipad (FAA identifier **CA37**) has an FAA-approved instrument approach procedure (IAP).

Specifically, the FAA established a **Special COPTER RNAV (GPS) 040 Point In Space Standard Instrument Approach Procedure (SIAP)** and a **Special COPTER RNAV (GPS) 227 Departure Procedure** to serve the heliport. These are special procedures, often used by Helicopter Air Ambulance (HAA) operators, which may require specific pilot training due to their unique characteristics.

While publicly available airport information websites like AirNav and AOPA Airports indicate that "there are no published instrument procedures at CA37," this refers to *public* standard instrument procedures. The special procedures are documented in official government publications, such as the Federal Register, which provide the regulatory basis for their use and associated airspace requirements.

Why does FAA 77.9 require notice for construction near a heliport with at least one FAA-approved instrument approach procedure?

FAA Part 77.9 requires notice for construction near heliports with instrument approaches to ensure new structures do not create a hazard to air navigation, especially by interfering with instrument flight procedures or visibility. The FAA's Obstruction Evaluation Program uses this notice to assess whether the construction would adversely affect flight safety, require changes to existing instrument procedures, restrict visual lines of sight, or derogate airport capacity. This process helps the FAA evaluate the potential impact, determine appropriate marking and lighting, and inform the aviation community about new objects that affect navigable airspace

Exhibit N

Jonathan DiSalvo

From: Lou & Mary Ellen McTamaney <lmctamaney@comcast.net>
Sent: Thursday, November 20, 2025 2:09 PM
To: Jonathan DiSalvo
Cc: Roy Brewer
Subject: Application #: 241360, 3500 Paul Sweet Road., APNs: 025-013-37 & 102-061-10
Attachments: FAA_Form_7460-1_042023.pdf; § 77.9 Construction or alteration requiring notice.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Hello Jonathan…

It is my understanding that Workbench has not filed FAA Form 7460-1 as required by FAA regulation part 77.9 (attached) for the construction proposed by Application #: 241360.

In checking on the applicability of FAA Regulation Part 77.9 to the hospital helipad, I asked the following question:

> *Does FAA regulation part 77.9 apply to a private hospital helipad with an FAA-approved instrument approach procedure?*

The answer:

> Yes, FAA regulation Part 77.9 applies to a private hospital helipad with an FAA-approved instrument approach procedure because the rule mandates that any construction or alteration at a heliport with an approved instrument approach procedure must be submitted for review
> . This is because any construction or alteration, regardless of height, located at a public-use or private-use airport or heliport with an FAA-approved instrument approach procedure is required to be filed with the FAA under Part 77.9.
>
> - **Part 77 applies to construction/alteration**: Part 77.9 applies to any construction or alteration that can affect navigable airspace.
> - **Instrument approach procedures trigger the rule**: The presence of an FAA-approved instrument approach procedure on a heliport is a key factor that triggers the need for Part 77.9 notification, even for private heliports.
> - **Notice is required**: If a proposed construction or alteration exceeds the specific imaginary surfaces outlined in § 77.9(b), the responsible party must notify the FAA.
> - **Exemptions**: There are some exemptions to Part 77.9, but any construction or alteration on a heliport with an FAA-approved instrument approach procedure is generally not exempt.

From my previous analysis (attached) it was determined that:

> *"Dominican Hospital's helipad (FAA identifier CA37) has an FAA-approved instrument approach procedure (IAP)".*

Exhibit N

Specifically, to serve the heliport, the FAA established:

- a Special COPTER RNAV (GPS) 040 Point In Space Standard Instrument Approach Procedure (SIAP) and
- a Special COPTER RNAV (GPS) 227 Departure Procedure.

These are special procedures, often used by Helicopter Air Ambulance (HAA) operators, which may require specific pilot training due to their unique characteristics.

Regarding FAA § 77.9(b), the 25 to 1 slope of § 77.9(b)(3) applies because the proposed construction at 834 feet is within 5,000 Ft from the helipad.

Thank you for considering this in your review of Application #: 241360.

Lou McTamaney
President, Dominican Oaks Resident Council
3400 Paul Sweet Road Unit C302

Exhibit N

NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION

§ 77.7 Form and time of notice.

(a) If you are required to file notice under §77.9, you must submit to the FAA a completed FAA Form 7460–1, Notice of Proposed Construction or Alteration. FAA Form 7460–1 is available at FAA regional offices and on the Internet.

(b) You must submit this form at least 45 days before the start date of the proposed construction or alteration or the date an application for a construction permit is filed, whichever is earliest.

(c) If you propose construction or alteration that is also subject to the licensing requirements of the Federal Communications Commission (FCC), you must submit notice to the FAA on or before the date that the application is filed with the FCC.

(d) If you propose construction or alteration to an existing structure that exceeds 2,000 ft. in height above ground level (AGL), the FAA presumes it to be a hazard to air navigation that results in an inefficient use of airspace. You must include details explaining both why the proposal would not constitute a hazard to air navigation and why it would not cause an inefficient use of airspace.

(e) The 45-day advance notice requirement is waived if immediate construction or alteration is required because of an emergency involving essential public services, public health, or public safety. You may provide notice to the FAA by any available, expeditious means. You must file a completed FAA Form 7460–1 within 5 days of the initial notice to the FAA. Outside normal business hours, the nearest flight service station will accept emergency notices.

§ 77.9 Construction or alteration requiring notice.

If requested by the FAA, or if you propose any of the following types of construction or alteration, you must file notice with the FAA of:

(a) Any construction or alteration that is more than 200 ft. AGL at its site.

(b) Any construction or alteration that exceeds an imaginary surface extending outward and upward at any of the following slopes:

(1) 100 to 1 for a horizontal distance of 20,000 ft. from the nearest point of the nearest runway of each airport described in paragraph (d) of this section with its longest runway more than 3,200 ft. in actual length, excluding heliports.

(2) 50 to 1 for a horizontal distance of 10,000 ft. from the nearest point of the nearest runway of each airport described in paragraph (d) of this section with its longest runway no more than 3,200 ft. in actual length, excluding heliports.

(3) 25 to 1 for a horizontal distance of 5,000 ft. from the nearest point of the nearest landing and takeoff area of each heliport described in paragraph (d) of this section.

(c) Any highway, railroad, or other traverse way for mobile objects, of a height which, if adjusted upward 17 feet for an Interstate Highway that is part of the National System of Military and Interstate Highways where overcrossings are designed for a minimum of 17 feet vertical distance, 15 feet for any other public roadway, 10 feet or the height of the highest mobile object that would normally traverse the road, whichever is greater, for a private road, 23 feet for a railroad, and for a waterway or any other traverse way not previously mentioned, an amount equal to the height of the highest mobile object that would normally traverse it, would exceed a standard of paragraph (a) or (b) of this section.

(d) Any construction or alteration on any of the following airports and heliports:

(1) A public use airport listed in the Airport/Facility Directory, Alaska Supplement, or Pacific Chart Supplement of the U.S. Government Flight Information Publications;

(2) A military airport under construction, or an airport under construction that will be available for public use;

(3) An airport operated by a Federal agency or the DOD.

(4) An airport or heliport with at least one FAA-approved instrument approach procedure.

(e) You do not need to file notice for construction or alteration of:

(1) Any object that will be shielded by existing structures of a permanent and substantial nature or by natural terrain or topographic features of equal or greater height, and will be located in the congested area of a city, town, or settlement where the shielded structure will not adversely affect safety in air navigation;

(2) Any air navigation facility, airport visual approach or landing aid, aircraft arresting device, or meteorological device meeting FAA-approved siting criteria or an appropriate military service siting criteria on military airports, the location and height of which are fixed by its functional purpose;

(3) Any construction or alteration for which notice is required by any other FAA regulation.

(4) Any antenna structure of 20 feet or less in height, except one that would increase the height of another antenna structure.

Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177
Fax: (817) 222-5920

Website: https://oeaaa.faa.gov

Exhibit N

INSTRUCTIONS FOR COMPLETING FAA FORM 7460-1

PLEASE TYPE or PRINT

ITEM #1. Please include the name, address and phone number of a personal contact point as well as the company name.

ITEM #2. Please include the name, address and phone number of a personal contact point as well as the company name.

ITEM #3. New Construction would be a structure that has not yet been built.

Alteration is a change to an existing structure such as the addition of a side mounted antenna, a change to the marking and lighting, a change to power and/or frequency, or a change to the height. The nature of the alteration shall be included in ITEM #21 "Complete Description of Proposal".

Existing would be a correction to the latitude and/or longitude, a correction to the height, or if filing on an existing structure which has never been studied by the FAA. The reason for the notice shall be included in ITEM #21 "Complete Description of Proposal".

ITEM #4. If Permanent, so indicate. If Temporary, such as a crane or drilling derrick, enters the estimated length of time the temporary structure will be up.

ITEM #5. Enter the date that construction is expected to start and the date that construction should be completed.

ITEM #6. Please indicate the type of structure. DO NOT LEAVE BLANK.

ITEM #7. In the event that obstruction marking and lighting is required, please indicate type desired. If no preference, check "other" and indicate "no preference" DO NOT LEAVE BLANK. NOTE: High Intensity lighting shall be used only for structures over 500' AGL. In the absence of high intensity lighting for structures over 500' AGL, marking is also required.

ITEM #8. If this is an existing tower that has been registered with the FCC, enter the FCC Antenna Structure Registration number here.

ITEM #9 and #10. Latitude and longitude must be geographic coordinates, accurate to within the nearest second or to the nearest hundredth of a second if known. Latitude and longitude derived solely from a hand-held G P S instrument is NOT acceptable. A hand-held GPS is only accurate to within 100 meters (328 feet) 95 percent of the time. This data, when plotted, should match the site depiction submitted under ITEM #20.

ITEM #11. NAD 83 is preferred; however, latitude and longitude may be submitted in NAD 27. Also, in some geographic areas where NAD 27 and NAD 83 are not available other datum may be used. It is important to know which datum is used. DO NOT LEAVE BLANK.

ITEM #12. Enter the name of the nearest city and state to the site. If the structure is or will be in a city, enter the name of that city and state.

ITEM #13. Enter the full name of the nearest public-use (not private-use) airport or heliport or military airport or heliport to the site.

ITEM #14. Enter the distance from the airport or heliport listed in #13 to the structure.

ITEM #15. Enter the direction from the airport or heliport listed in #13 to the structure.

ITEM #16. Enter the site elevation above mean sea level and expressed in whole feet rounded to the nearest foot (e.g. 17'3" rounds to 17', 17'6" rounds to 18'). This data should match the ground contour elevations for site depiction submitted under ITEM #20.

ITEM #17. Enter the total structure height above ground level in whole feet rounded to the next highest foot (e.g. 17'3" rounds to 18'). The total structure height shall include anything mounted on top of the structure, such as antennas, obstruction lights, lightning rods, etc.

ITEM #18. Enter the overall height above mean sea level and expressed in whole feet. This will be the total of ITEM #16 + ITEM #17.

ITEM #19. If an FAA aeronautical study was previously conducted, enter the previous study number.

ITEM #20. Enter the relationship of the structure to roads, airports, prominent terrain, existing structures, etc. Attach an 8-1/2" x 11" non-reduced copy of the appropriate 7.5 minute U.S. Geological Survey (USGS) Quadrangle Map MARKED WITH A PRECISE INDICATION OF THE SITE LOCATION. To obtain maps, contact USGS at 1-888-275-8747 or via internet at "http://store.usgs.gov". If available, attach a copy of a documented site survey with the surveyor's certification stating the amount of vertical and horizontal accuracy in feet.

ITEM #21.

- For transmitting stations, include maximum effective radiated power (ERP) and all frequencies.
- For antennas, include the type of antenna and center of radiation (Attach the antenna pattern, if available).
- For microwave, include azimuth relative to true north.
- For overhead wires or transmission lines, include size and configuration of wires and their supporting structures (Attach depiction).
- For each pole/support, include coordinates, site elevation, and structure height above ground level or water.
- For buildings, include site orientation, coordinates of each corner, dimensions, and construction materials.
- For alterations, explain the alteration thoroughly.
- For existing structures, thoroughly explain the reason for notifying the FAA (e.g. corrections, no record or previous study, etc.).

Filing this information with the FAA does not relieve the sponsor of this construction or alteration from complying with any other federal, state or local rules or regulations. If you are not sure what other rules or regulations apply to your proposal, contact local/state aviation's and zoning authorities.

Paperwork Reduction Work Act Statement: A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection displays a currently valid OMB Control Number. The OMB control number for this information collection is 2120-0001. Public reporting for this collection of information is estimated to be approximately 19 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing and reviewing the collection of information. All responses to this collection of information are mandatory for anyone proposing construction or alteration that meets the criteria contained in 14 CFR 77. This information is collected to evaluate the effect of proposed construction or alteration on air navigation and is not confidential. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, Federal Aviation Administration, 10101 Hillwood Parkway, Fort Worth, TX 76177-1524.

Privacy Act Statement (5 U.S.C. § 552a, as amended): AUTHORITY: The FAA is responsible for issuing a determination based on extensive analysis completed in accordance with 49 United States Code (USC) Sections 44718. Title 14 of the Code of Federal Regulations (14 CFR), part 77 authorizes FAA to collect this information. PURPOSE(S): FAA will use the information provided to administer the Aeronautical Study Process. ROUTINE USE(S): In accordance with DOT's system of records notice, DOT/ALL 16 Mailing Management System and DOT/FAA 826 Petitions for Exemption, Other than Medical Exemption-Public Dockets, the information provided may be disclosed to officials within the Federal government and the public in general.

Form Approved OMB No.2120-0001
Expiration Date: 04/30/2023

Please Type or Print on This Form

U.S. Department of Transportation
Federal Aviation Administration

Failure To Provide All Requested Information May Delay Processing of Your Notice

Notice of Proposed Construction or Alteration

FOR FAA USE ONLY
Aeronautical Study Number

1. Sponsor *(person, company, etc. proposing this action):*
Attn. of
Name: _____
Address: _____
_____
City: _____ State: _____ Zip: _____
Telephone: _____ Fax: _____

2. Sponsor's Representative *(if other than #1):*
Attn. of
Name: _____
Address: _____
_____
City: _____ State: _____ Zip: _____
Telephone: _____ Fax: _____

3. Notice of: ☐ New Construction ☐ Alteration ☐ Existing

4. Duration: ☐ Permanent ☐ Temporary (___ months, ____days)

5. Work Schedule: Beginning _____ End _____

6. Type: ☐ Antenna Tower ☐ Crane ☐ Building ☐ Power Line
☐ Landfill ☐ Water Tank ☐ Other _____

7. Marking/Painting and/or Lighting Preferred:
☐ Red Lights and Paint ☐ Dual - Red and Medium Intensity
☐ White-Medium Intensity ☐ Dual - Red and high Intensity
☐ White -High Intensity ☐ Other

8. FCC Antenna Structure Registration Number *(if applicable)*:
_____

9. Latitude: ____ 0 ____ ____ . ____ "

10. Longitude: ____ 0 ____ ____ . ____ "

11. Datum: ☐ NAD 83 ☐ NAD 27 ☐ Other

12. Nearest: City: _____ State _____

13. Nearest *Public-use* *(not private-use)* or Military Airport or Heliport:
_____

14. Distance from #13. to Structure: _____

15. Direction from #13. to Structure: _____

16. Site Elevation *(AMSL)*: _____ ft.

17. Total Structure Height *(AGL)*: _____ ft.

18. Overall Height (#16 + #17) *(AMSL)*: _____ ft.

19. Previous FAA Aeronautical Study Number *(if applicable)*:
_____-OE

20. Description of Location: *(Attach a USGS 7.5 minute Quadrangle Map with the precise site marked and any certified survey)*

21. Complete Description of Proposal:

Frequency/Power (kW)	

Notice is required by 14 Code of Federal Regulations, part 77 pursuant to 49 U.S.C., Section 44718. Persons who knowingly and willingly violate the notice requirements of part 77 are subject to a civil penalty of $1,000 per day until the notice is received, pursuant to 49 U.S.C., Section 46301(a)

I hereby certify that all of the above statements made by me are true, complete, and correct to the best of my knowledge. In addition, I agree to mark and/or light the structure in accordance with established marking & lighting standards as necessary.

Date	Typed or Printed Name and Title of Person Filing Notice	Signature

Arlie Takahashi
Unit A303
3400 Paul Sweet Rd
Santa Cruz, CA 95065-1549

SAN JOSE CA 950
3 DEC 2025 PM 1 L

1775 2025 FREEDOM FOREVER/USA

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CDI - Planning
DEC 5 2025
County of Santa Cruz

The Santa Cruz County Planning Commission
County Government Center
701 Ocean Street, Room 420
Santa Cruz, CA 95060

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CDI - Planning
DEC 5 2025
County of Santa Cruz

Dominican Oaks
3400 Paul Sweet Rd. Apt. 303
Santa Cruz, CA 95065
Dec 2, 2025

The Santa Cruz County Planning Commission
County Government Center
701 Ocean Street, Room 420
Santa Cruz, CA 95060

Re: Proposed 6 story apt building next to Senior Residence, Dominican Oaks.

Dear Commission Member,

I am an 88 year old resident of Dominican Oaks. I am now being helped by a certified care-giver. There is no room for the cars of these care-givers. They park on the side of the road to work here. The care-giver is vital to the functioning of this vital non-profit senior residence. Cars parked on the side of the road by residence or visitors to a 6 story apartment building could really mess up this vital service!

There are many more reasons for voting NO on building a 6 story apartment building at this location. But this may not be mentioned by others & it is very important to myself & others.

Sincerely yours,
Chiu Takahashi

Exhibit N

Exhibit N

MARY LOU WEIDLICH
3400 PAUL SWEET RD. B221
SANTA CRUZ, CA 95065

SAN JOSE CA 950
3 DEC 2025 PM 1 L

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DEC 8 2025
County of Santa Cruz

Chairperson Jonathan DiSalvo
Sant. Cruz Cty Planning Commission
701 Ocean St. Fourth Floor
Santa Cruz Ca. 95060

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DEC 9
County of Santa Cruz

Mary Lou Weidlich
3400 Paul Sweet Rd, B221
Santa Cruz, CA 95065

Chairperson Jonathan DiSalvo
Santa Cruz County Planning Commission
701 Ocean Street, Fourth Floor
Santa Cruz, CA 95060

Re: Opposition to Proposed Housing Development at 3500 Paul Sweet Road

Dear Mr. DiSalvo,

I live at Dominican Oaks. I chose this retirement community for my forever home. One of the pivotal factors that led her to choose this retirement community was its proximity to Dominican Hospital. At this stage in life, quick access to medical care is incredibly important, and provides peace of mind not only for me but for my family. Knowing that emergency services and specialized care are minutes away gives me confidence that I can live independently, while feeling safe and supported.

The traffic on Paul Sweet Road getting onto Soquel at peak hours is already horrendous, and backs up to the cemetery. With the additional automobile count from 105 units, the road from Dominican Oaks will be gridlocked. Parking on Paul Sweet Road is already filled up, and these additional automobiles will make it impossible to find parking anywhere near Dominican Oaks, including guest and resident parking within Dominican Oaks property.

Paul Sweet Road is a narrow, two-lane road, and the only route in and out of Dominican Oaks. The added traffic from this development would turn that sole lifeline into a bottleneck, delaying emergency responders and putting vulnerable residents in grave danger. Delays can mean the difference between life and death. Protecting clear and reliable access to medical care should and must remain a priority for planning decisions in our area.

I understand that Santa Cruz County needs more housing but building this project here, directly beside a hospital and senior community, creates unacceptable risks to safety, emergency care, fire response, and quality of life.

For all these reasons, I respectfully urge you to reject this proposal and work toward housing solutions that do not endanger seniors or compromise access to emergency response.

Thank you for considering my perspective.

Sincerely,

Mary Lou Weidlich 12-1-25

Mary Lou Weidlich

Exhibit N

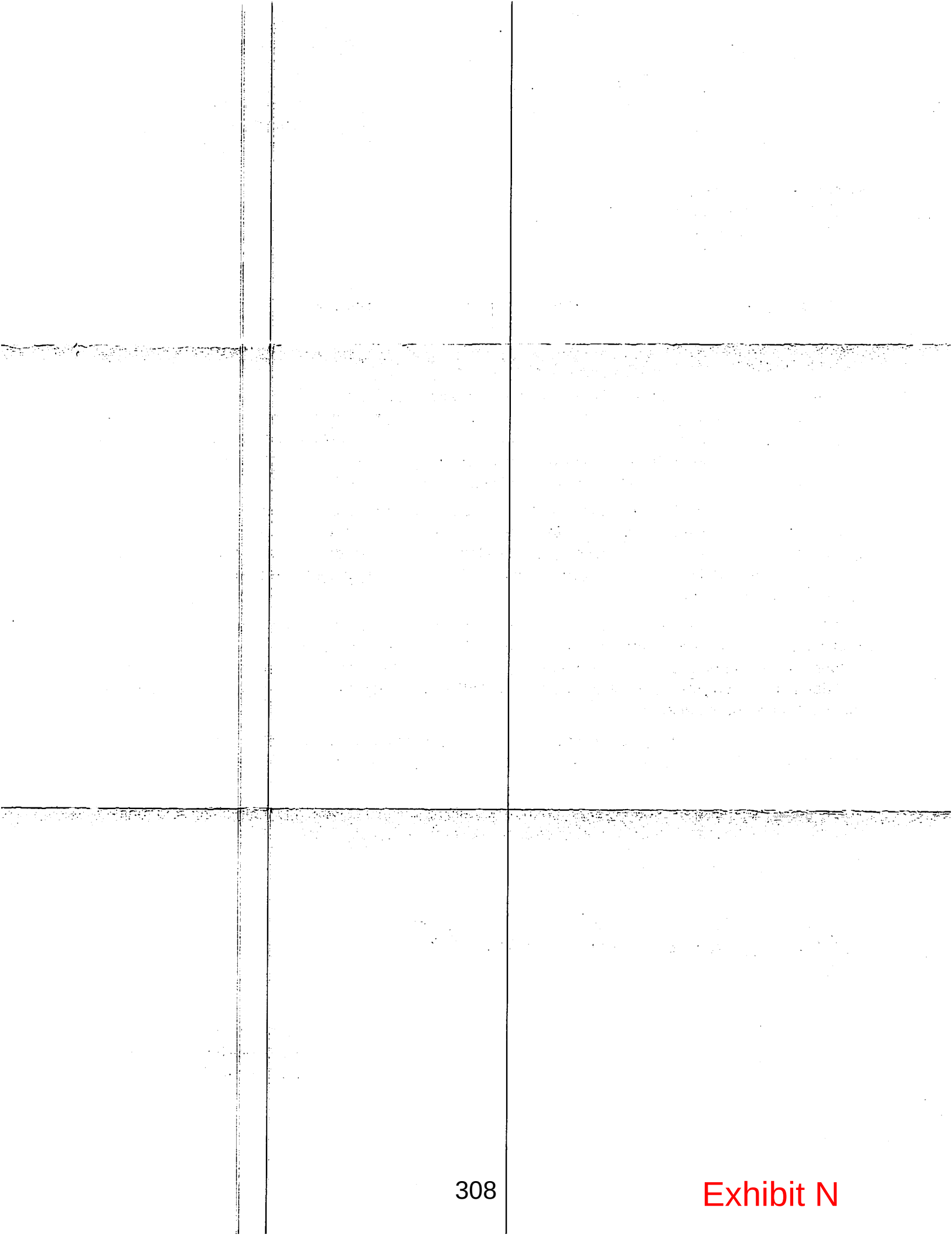

Exhibit N

Mr. Ronald W. Barrett
4917 Acuna St
San Diego, CA 92117

SAN DIEGO CA 920
5 DEC 2025 PM 2 L

USA FOREVER

Chair person Jonathan DiSalvo
Santa Cruz County Planning Commission
701 Ocean Street, Fourth Floor
Santa Cruz, CA 95060

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DEC 9 2025
County of Santa Cruz

95060840C3

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Exhibit N

Ron Barrett
4917 Acuna Street
San Diego, CA 92117
12/04/2024

Chairperson Jonathan DiSalvo
Santa Cruz County Planning Commission
701 Ocean Street, Fourth Floor
Santa Cruz, CA 95060

Re: Opposition to Proposed Housing Development at 3500 Paul Sweet Road

Dear Mr. DiSalvo,

My Mother lives at Dominican Oaks. One of the pivotal factors in her decision was its proximity to the hospital and the safety brought about by the lack of development on Paul Sweet Road. At this stage in life, quick access to medical care provides peace of mind not only for my Mother but for the entire family. Knowing that emergency services and specialized care are minutes away gives me confidence that my Mother can live independently while feeling safe and supported.

There has never been a threat like the one Dominican Oaks is facing today. I am deeply concerned about the health and safety dangers of this "Sweet Homes" six-story, 105-unit tenement project right in Dominican Oaks' front yard. My mother often walks on Paul Sweet road in order to maximize her health and fitness. The increased traffic from this development would further jeopardize her safety.

Paul Sweet Road is the only route in and out for Dominican Oaks. Additional traffic from this development would turn that sole lifeline into a bottleneck, delaying emergency responders and putting vulnerable residents in grave danger and delays can mean the difference between life and death. Protecting clear and reliable access to medical care should remain a priority for planning decisions in our area.

I understand that Santa Cruz County needs more housing, but building this project here, directly beside a hospital and senior community, creates unacceptable risks to safety, emergency care, and quality of life.

For all these reasons, I respectfully urge you to reject this proposal and work toward housing solutions that do not endanger seniors or compromise access to emergency care.

Thank you for considering my perspective.

Sincerely,

Ron Barrett

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DEC 9 2025
County of Santa Cruz

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Exhibit N

SAN JOSE CA 950

9 DEC 2025 PM 4 L

THE SANTA CRUZ COUNTY PLANNING COMMISSON
COUNTY GOVERNMENT CENTER
701 OCEAN STREET, ROOM 420
SANTA CRUZ, CA 95060

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DEC 11 2025
County of Santa Cruz

95060-407199

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Exhibit N

SUPPORT OUR VULNERABLE SENIORS AT DOMINICAN OAKS

An aggressive developer, Workbench, proposes a six-story project next door, inches from our property line. If built, this complex will create fire hazards, obstruct access to emergency equipment and safe evacuations for unpreditctable natural disasters.

We have many residents here, including many with disabilites that affect their sight, hearing or ability to make quick decisions. A majority have mobility made possible only by walkers, wheelchairs, or canes. ~~my situation~~ The buildings will impair my view – I have lived here 9 years, am 95,
Ultimately, the hastily proposed project will violate our rights. Remember that rights for the disabled are civil rights.

Please support our opposition to this terrible proposal to build a poorly thought-out apartment complex at 3500 Paul Sweet Road. Your help is urgent, and there is a very tight deadline for written comments.

Write one letter and mail it immediately, or by December 17 to:

The Santa Cruz County Planning Commission
County Government Center
701 Ocean Street, Room 420
Santa Cruz, CA 95060

Ask that your written comments or concerns be included in the packets of information presented to the Commission at their next meeting.

Ask the Commissioners to kill the project on Paul Sweet Road when they vote.
Tell them to vote <u>NO!</u>

If you would like to send an email message to the members, send to the first commissioner on the list and copy the others.

(see back of page for an email list of the Commissioners)

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CDI Planning
DEC 11 2025
County of Santa Cruz

Exhibit N

s.pavonetti@gmail.com
rizcon@earthlink.net
jessenickell3art@gmail.com
janerbarr@aol.com
trina.barton@santacruzcountyca.gov
sandy.brown@santacruzcountyca.gov
yeseniajduran@gmail.com
kami@davidlyng.com
renee@reneesgarden.com
jagomez173@gmail.com

CC:
Manu.Koenig@santacruzcountyca.gov
Jonathan.DiSalvo@santacruzcountyca.gov
Donovan.Arteaga@santacruzcountyca.gov

Sincerely,

Concerned Residents of Dominican Oaks

Exhibit N

Thomas O'Rourke
100 Longview Dr.
Santa Cruz, CA 95060-2632

SAN JOSE CA 950

12 DEC 2025 PM 1 L

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DEC 15 2025
County of Santa Cruz

CHAIRMAN JONATHON DiSALVO
SC County Planning Commission
701 OCEAN Street, 4th FLOOR
SANTA CRUZ CA, 95060

Exhibit N

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DEC 15 2025
County of Santa Cruz

Chairperson Jonathan DiSalvo
Santa Cruz County Planning Commission
701 Ocean Street, Fourth Floor
Santa Cruz, CA 95060

Re: Opposition to Proposed Housing Development at 3500 Paul Sweet Road

Dear Mr. DiSalvo,

My friend lives at Dominican Oaks. One of reasons she chose this retirement community was its proximity to the hospital. At this stage in life, quick access to medical care provides peace of mind. Knowing that emergency services and specialized care are minutes away gives me confidence that my friend can live independently while feeling safe and supported.

There has never been a threat like the one Dominican Oaks is facing today. I am deeply concerned about the health and safety dangers of this "Sweet Homes" six-story, 105-unit tenement project right in Dominican Oaks' front yard.

Paul Sweet Road is the only route in and out for Dominican Oaks. Additional traffic from this development would turn that sole lifeline into a bottleneck, delaying emergency responders and putting vulnerable residents in grave danger and delays can mean the difference between life and death. Protecting clear and reliable access to medical care should remain a priority for planning decisions in our area.

I understand that Santa Cruz County needs more housing, but building this project here, directly beside a hospital and senior community, creates unacceptable risks to safety, emergency care, and quality of life.

For all these reasons, I respectfully urge you to reject this proposal and work toward housing solutions that do not endanger seniors or compromise access to emergency care.

Thank you for considering my perspective.

Sincerely,

Thomas E. O'Rourke

Exhibit N

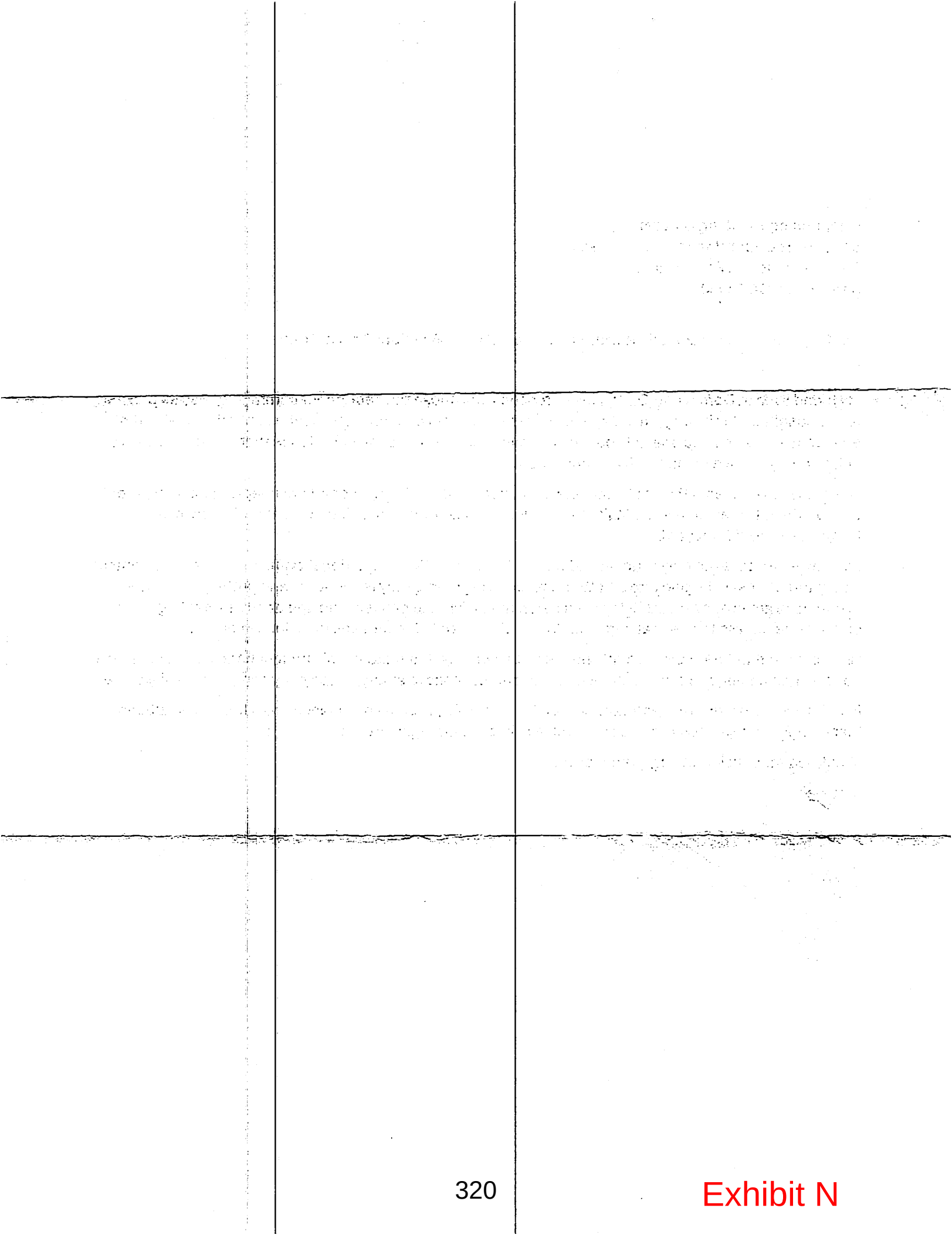

Exhibit N

Chairperson Jonathan DiSalvo
Santa Cruz County Planning Commission
701 Ocean Street, Fourth Floor
Santa Cruz, CA 95060

Re: Opposition to Proposed Housing Development at 3500 Paul Sweet Road

Dear Mr. DiSalvo,

My friend lives at Dominican Oaks. One of reasons she chose this retirement community was its proximity to the hospital. At this stage in life, quick access to medical care provides peace of mind. Knowing that emergency services and specialized care are minutes away gives me confidence that my friend can live independently while feeling safe and supported.

There has never been a threat like the one Dominican Oaks is facing today. I am deeply concerned about the health and safety dangers of this "Sweet Homes" six-story, 105-unit tenement project right in Dominican Oaks' front yard.

Paul Sweet Road is the only route in and out for Dominican Oaks. Additional traffic from this development would turn that sole lifeline into a bottleneck, delaying emergency responders and putting vulnerable residents in grave danger and delays can mean the difference between life and death. Protecting clear and reliable access to medical care should remain a priority for planning decisions in our area.

I understand that Santa Cruz County needs more housing, but building this project here, directly beside a hospital and senior community, creates unacceptable risks to safety, emergency care, and quality of life.

For all these reasons, I respectfully urge you to reject this proposal and work toward housing solutions that do not endanger seniors or compromise access to emergency care.

Thank you for considering my perspective.

Sincerely,

Lisa O'Rourke

Exhibit N

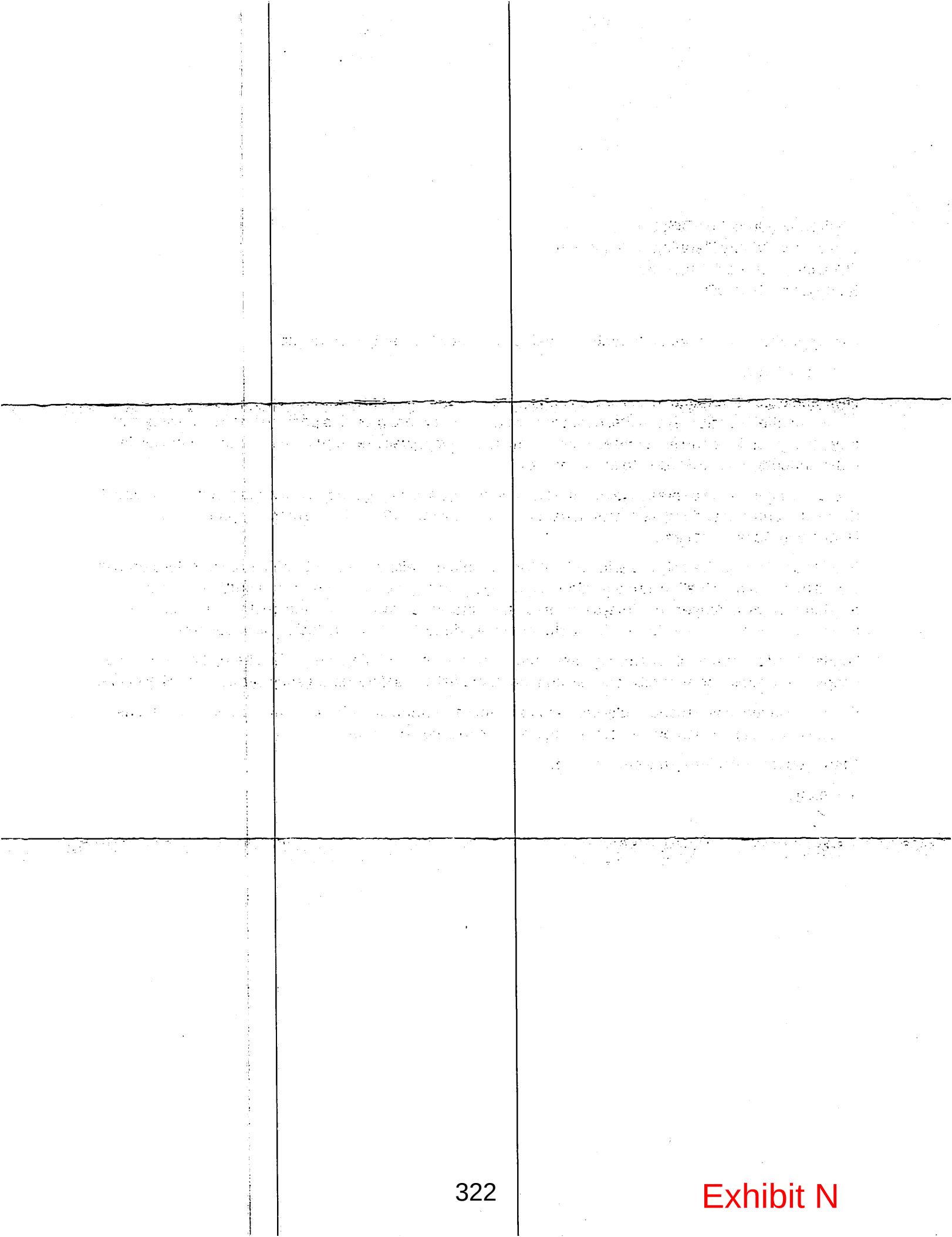

Exhibit N

Mary Lou Weidlich
Unit B221
3400 Paul Sweet Rd
Santa Cruz, CA 95065-1553

SAN JOSE CA 950

17 DEC 2025 PM 3 L

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CDI - Planning
DEC 19 2025
County of Santa Cruz

Chairperson Timothy DiSalvo
S.C. Planning Commission
701 Ocean St., Fourth floor
Santa Cruz Ca. 95060

95060$4003 C153

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Exhibit N

Chairperson Jonathan DiSalvo

Santa Cruz Planning Commission

701 Ocean Street, Fourth Floor

Santa Cruz, Ca. 95060

Mary Lou Weidlich

3400 Paul Sweet

B221

Santa Cruz 95065

Re: Opposition to Proposed Housing Development at 3500 Paul Sweet Rd.

Dear Mr. DiSalvo,

I live at Dominican Oaks and have done so for close to 10 years. Over the course of time, the homeless encampments near our 3400 Paul Sweet Rd. facility have become more problematic. While I sincerely and deeply sympathize with their plight of being unhomed and unsupported, the reality exists that in their encampments, deep in the forest , very near to our facility, have become more and more often sites for unscheduled fire events. This is understandable during winter's approach and low rain totals. Camp fires become more frequent and runaway fires more possible. That fact, compounded by the proximity of a very flammable Eucalyptus grove right next to our property, has most of us very concerned about the accessibility of fire equipment to this area in the very possible event of a fire in the surrounding growth which would surely threaten our buildings and us.

The recent studies have pointed out that the buildings at 3500 Paul Sweet Rd. would not have clear access for fire equipment especially behind it and most importantly trucks to the back of their building, which will incidentally also be right next to the same flammable grove of trees.

Fire equipment to their site would have to gain access from our parking area, not very wide. That area is, coincidently, the same area where emergency service vehicles and equipment must come on an almost daily basis, if I may be honest. As you well know, our population is quite aged, the mean age being well over 85 if I had to guess, with so many very much older than that and therefore subject to an ongoing array of urgent medical issues on an ongoing basis.

My great concern is that, with the addition of this development so very close to our facility, our health, safety and wellbeing can be greatly compromised.

Please consider adding your voice to the dissenting voices of our vulnerable community in opposing this development in any way you can. We would be so eternally grateful.

Sincerely,

Mary Lou Weidlich, Dec. 15, 2025

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DEC 19 2025
County of Santa Cruz

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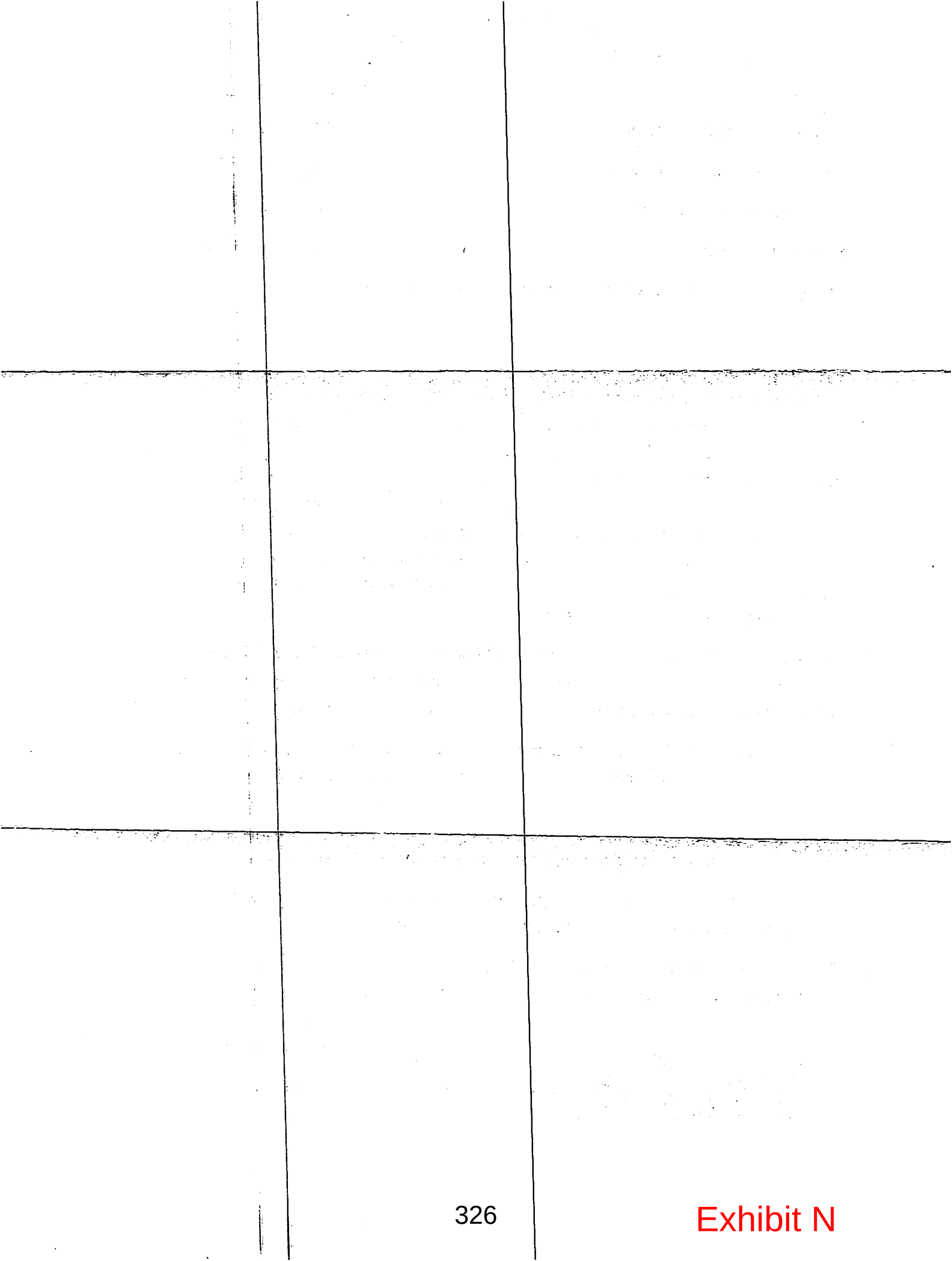

Exhibit N

Jan Reeves
2015 Condor Dr
Redmond, OR 97756-1262

PORTLAND OR RPDC 972
18 DEC 2025 PM 3 L

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DEC 22 2025
County of Santa Cruz

Jonathan DiSalvo
Santa Cruz County Planning Emer.
701 Ocean St. 4th Floor
Santa Cruz, CA 95060

95060-4071 327

Exhibit N

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CDI - Planning
DEC 22 2025
County of Santa Cruz

Chairperson Jonathan DiSalvo
Santa Cruz County Planning Commission
701 Ocean Street, Fourth Floor
Santa Cruz, CA 95060

Re: Opposition to Proposed Housing Development at 3500 Paul Sweet Road

Dear Mr. DiSalvo,

My Mother lives at Dominican Oaks. Together, we chose this retirement community for my Mother's home. One of the pivotal factors in that decision was its proximity to the hospital. At this stage in life, quick access to medical care provides peace of mind not only for my Mother but for the entire family. Knowing that emergency services and specialized care are minutes away gives me confidence that my Mother can live independently while feeling safe and supported.

There has never been a threat like the one Dominican Oaks is facing today. I am deeply concerned about the health and safety dangers of this "Sweet Homes" six-story, 105-unit tenement project right in Dominican Oaks' front yard.

Paul Sweet Road is the only route in and out for Dominican Oaks. Additional traffic from this development would turn that sole lifeline into a bottleneck, delaying emergency responders and putting vulnerable residents in grave danger and delays can mean the difference between life and death. Protecting clear and reliable access to medical care should remain a priority for planning decisions in our area.

I understand that Santa Cruz County needs more housing, but building this project here, directly beside a hospital and senior community, creates unacceptable risks to safety, emergency care, and quality of life.

For all these reasons, I respectfully urge you to reject this proposal and work toward housing solutions that do not endanger seniors or compromise access to emergency care.

Thank you for considering my perspective.

Sincerely,

Jan Reeves
2015 Condor Dr.
Redmond, OR 97756

Exhibit N

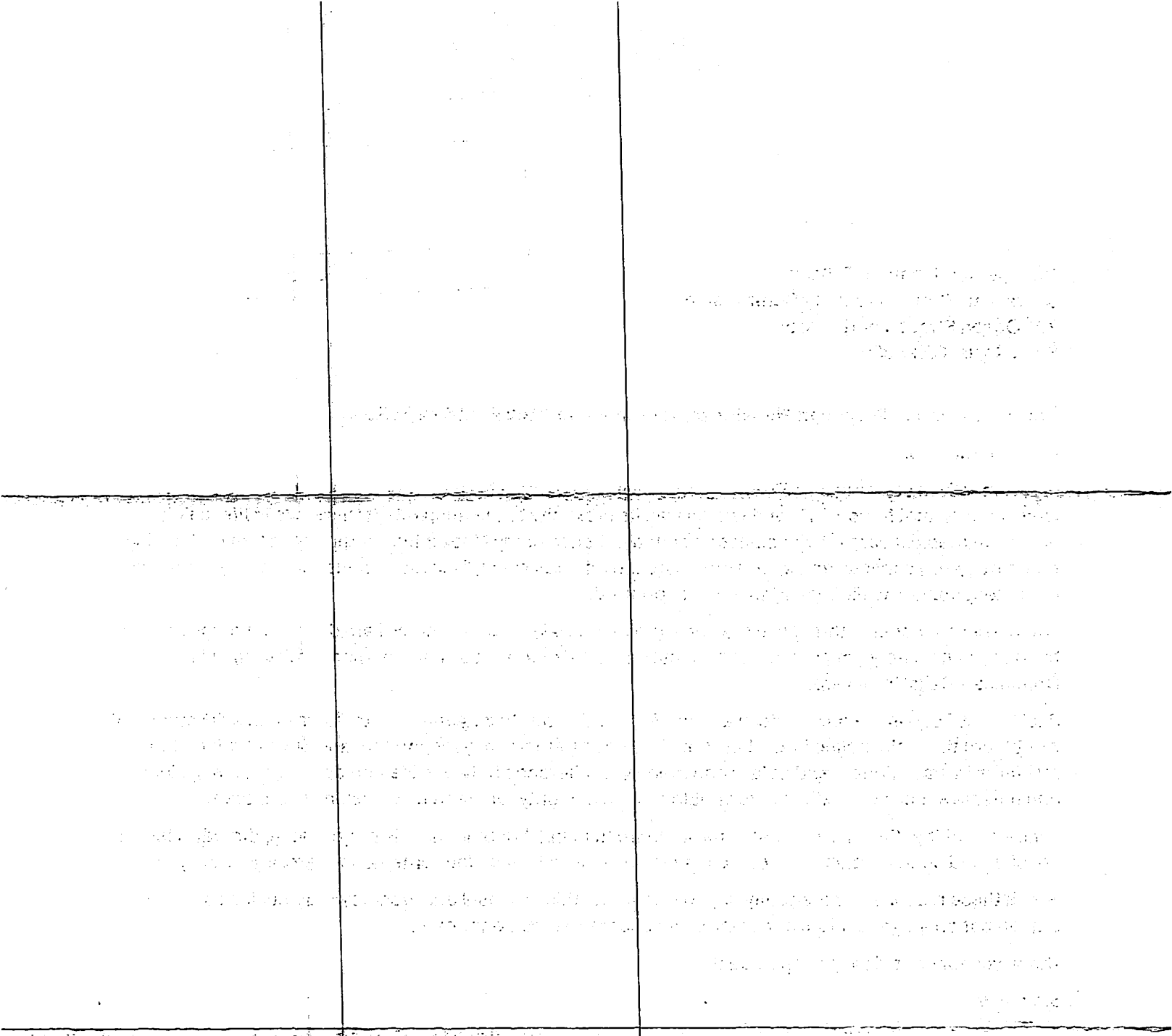

Exhibit N

Chairperson Jonathan DiSalvo
Santa Cruz County Planning Commission
701 Ocean Street, Fourth Floor
Santa Cruz, CA 95060

Re: Opposition to Proposed Housing Development at 3500 Paul Sweet Road

Dear Mr. DiSalvo,

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For all these reasons, I respectfully urge you to reject this proposal and work toward housing solutions that do not endanger seniors or compromise access to emergency care.

Thank you for considering my perspective.

Sincerely,

Mark Spence
Albany, Oregon

Exhibit N

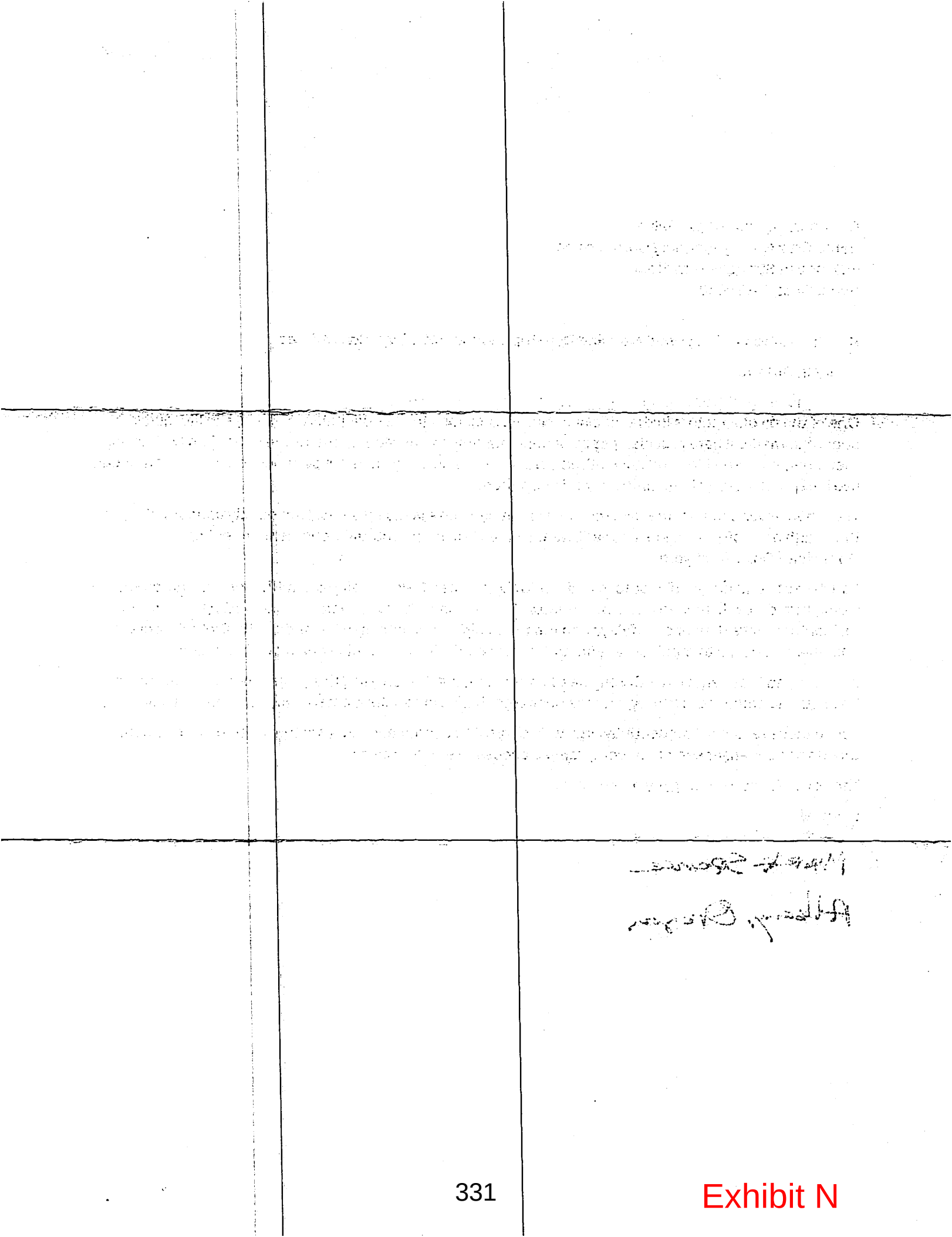

Exhibit N

Jonathan DiSalvo

From:	Virginia Lieb <virginia@lieb.com>
Sent:	Thursday, December 4, 2025 11:12 AM
To:	Jonathan DiSalvo; Manu Koenig; Jesse Nickell; janerbarr@aol.com; Trina Barton; Sandy Brown; yeseniajduran@gmail.com; kami@davidlyng.com; renee@reneesgarden.com; jagomez173@gmail.com
Cc:	Rachel Howley; Lou McTamaney; Amy Saulnier CA-Santa Cruz; Roy Brewer
Subject:	Fire dangers from 3500 Paul Sweet Road proposal
Follow Up Flag:	Follow up
Flag Status:	Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Hi Mr. DiSalvo, members of the Planning Commission and Supervisor Koenig,

One of the many safety issues with the proposed structure at 3500 Paul Sweet Road is that it creates fire hazards for both Dominican Oaks and Emergency Responders. A builder's failure to provide adequate room for firefighting equipment is a serious building and fire code violation in California.

We consulted with Bryan Gage - Battalion Chief, City of Greenfield Fire Dept. Regarding the 3500 PSR Development Proposal. This is his statement.

1. **Evacuation Challenges:** Bryan's review of the site plan indicates that the proposed development offers no viable solution for area evacuation. This deficiency would directly compromise life safety during an emergency for Dominican Oaks, Dominican Hospital, and the surrounding areas.
2. **Proximity and Collapse Zone Risk:** The proposed development's close proximity to Dominican Oaks places Dominican Oaks within a "collapse zone" during a catastrophic emergency. This significantly amplifies the existing life safety concerns associated with the site.
3. **Fire Apparatus Access and Operations:**
    1. In Bryan's professional opinion, a fire apparatus responding to either the proposed development or Dominican Oaks would severely impede access for other emergency vehicles needed for evacuation or medical care.
    2. Furthermore, he advises against positioning a fire truck between the proposed development and Dominican Oaks due to its location within the collapse zone, which would expose the emergency response team to unacceptable risk.

Exhibit N

We also contacted the Santa Cruz Fire Chief to discuss our concerns regarding fire and evacuation safety of this project, particularly the question then of how they would fight a fire at 3500 with the only access via Paul Sweet Road. Two other sides border Dominican Oaks and our path of egress. The fourth side is a highly flammable eucalyptus grove. We are awaiting a response.

We urge you to place great importance on this and all the other safety concerns that have been raised about 3500 Paul Sweet Road

Sincerely,
Virginia W. Lieb
Resident, Dominican Oaks
484-678-8301

Exhibit N

BREWER LOFGREN LLP

ATTORNEYS AT LAW
4005 MANZANITA AVENUE
SUITE 6-431
CARMICHAEL, CA 95608

www.brewerlofgren.com

April 1, 2025

Jonathan DiSalvo
Senior Planner
County of Santa Cruz
701 Ocean Street, 4th Floor
Santa Cruz CA 95060

RE: 3500 Paul Sweet Road

Dear Jonathan,

Thank you again for taking the time to speak with me by video call last Friday. I appreciate your time, the information you shared, and the confirmation of information appearing on the County's webpage. As I noted at the outset of our conversation last Friday, our firm represents Dominican Hospital and Dominican Oaks Retirement Community and write to express concerns about the application for a six-story apartment building at 3500 Paul Sweet Road. As you suggested, I am directing to you comments related to that application.

We conclude that the application does not qualify for what is generally referred to as the Builder's Remedy in SB 330, amending Government Code Section 65589.5(d)(5). Our reasoning is presented below.

1. **The application is not consistent with the provisions of SB 330**.

    a. <u>SB 330, Sec. 3 amends Section 65589.5 of the Government Code</u>. This section of the Government Code (GC) is known as and cited as the Housing Accountability Act (GC 65589.5(p)). What is generally referred to as the Builder's Remedy appears in Government Code Section 65589(d)(5).

    b. <u>General Plan designation and Zoning Categories</u>.
        i. The property is approximately 24, 471 square feet in size, or approximately 0.58 acres. [Source: County webpage, GISWeb, 3500 Paul Sweet Road, and CDI-Application Status, for Application Number 241094, reflecting approval of an application dated March 12, 2024, transferring 2,804 square feet from another parcel to this parcel, "resulting in two parcels of 25,471 square feet and 17,054 square feet in size." The Primary Applicant is identified as Sweet Developments LLC.]

Exhibit N

ii. At the time of the application, April 22, 2024, ninety-eight percent (98%) of the property (25,471sqare feet (sf) – 525 sf = 24,946 sf) had a General Plan designation of C-O (Professional Office). A small portion of the property, 525 square feet, representing approximately two (2) percent of the parcel size, had a General Plan designation of R-UH (Urban High Density Residential). [Source: County webpage, Major Project Applications/Builder's Remedy, 3500 Paul Sweet Road address, History. The applicant is identified as Workbench.]
iii. At the time of the application, April 22, 2024, ninety-eight percent (98%) of the property was zoned PA (Professional Office/Administrative). A small portion of the property, 525 square feet, representing slightly less than two percent of the parcel size, was zoned RM-2.5 Zone District. [Source: County webpage, Major Project Applications/Builder's Remedy, 3500 Paul Sweet Road address, History.]
iv. At the time of the application, April 22, 2024, ninety-eight percent of the property was inconsistent with both the zoning ordinance and the General Plan land use designation for the preponderance of the parcel. It seems illogical that a segment of a parcel representing less than two percent of that parcel's size can be relied upon to invoke a use inconsistent with the General Plan and zoning designations for the other ninety-eight percent of the parcel.

c. Certification by HCD of the County General Plan Housing Element pre-dates the application submittal date.

i. The County's webpage includes the County's 2023 General Plan Housing Element. The cover page of the Housing Element as it appears on the County's webpage and downloaded for purposes of this email is attached for your convenience. That cover page clearly states that the Housing Element was certified by the California Department of Housing and Community Development (HCD) on April 12, 2024.
ii. The County's webpage includes a brief history of the application for this property at Planning/Major Project Applications/Builder's Remedy. That history states that the applicant, identified as Workbench, "submitted an SB 330 Preliminary Application" for 3500 Paul Sweet Road on April 22,

Exhibit N

2024. You confirmed that application date during our video call last Friday.

iii. SB 330 Sec. 3(d), amending Government Code Section 65589.5, states:

1. "A local agency shall not disapprove a housing development project…unless it makes written finding, based on a preponderance of the evidence in the record, as to one of the following: (emphasis added)

> (5) The housing development project or emergency shelter is inconsistent with both the jurisdiction's zoning ordinance and the general plan land use designation as specified in any element of the general plan as it existed on the date the application was deemed complete.

2. The County's webpage clearly illustrates and confirms that the application for this property was submitted ten days after the Housing Element was certified by HCD. That certification signifies that the Housing Element was in compliance with HCD's requirements and, consequently, in substantial compliance with both SB 330 and the Housing Accountability Act.
3. In these circumstances, the applicant is not able to invoke the Builder's Remedy.

d. The correct application date is not earlier than October 2, 2024.

i. The initial application date, even if otherwise found to be consistent with SB 330, does not extend the Builder's Remedy to a revised application at the same address.

ii. Sec. 8(c), amending Government Code Section 65941.1(c):

1. "After submittal of all of the information required by subdivision (a), if the development proponent revises the project such that the number of residential units or square footage of construction changes by 20 percent or more…the housing development project shall not be deemed to have submitted a preliminary application that satisfies this section until the development proponent resubmits the information required by subdivision (a) so that it reflects the revisions." (emphasis added)

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2. What the County webpage describes as "an SB 330 preliminary application" was filed and fees paid on the application date of April 22, 2024, and reflected a six-story apartment building with 84 units. The project was revised to reflect a six-story building with 105 units, representing a 25% increase in the number of units proposed for the same address, 3500 Paul Sweet Road. [Sources: County webpage, CDI – Application Status, application number PA241023, dated April 22, 2024 (84 units); County webpage, Major Project Applications/Builder's Remedy, 3500 Paul Sweet Road address, History.]
3. You confirmed during our video call last Friday that the application now being reviewed comprises 105 units.
4. The application dated April 22, 2024, was revised to reflect a 25 percent increase in the proposed number of units, which exceeds the 20 percent noted in SB 330 Sec. 8(c) quoted above. The underscored text above from SB 330 Sec. 8(c) expressly states that in circumstances of a revised unit count equaling or exceeding 20 percent, the application "shall not be deemed" to be a preliminary application until such time as an application is resubmitted to reflect the revisions. That language renders the application date to be October 2, 2024, a full six months after HCD certified the County's Housing Element.
5. In these circumstances, too, the applicant is not able to invoke the Builder's Remedy.

2. **The application must comply with CEQA**.

Even if the application is otherwise found to satisfy the requirements of SB 330, nothing in SB 330 allows an application to avoid compliance with CEQA. See SB 330 Sec 3, amending Government Code 65589.5(e), and 65589.5(o)(C).

In consideration of all the above, we submit that the application for a six-story building at 3500 Paul Sweet Road does not qualify for the Builder's Remedy. In addition, any application for any use at this address must comply with CEQA. In the event the County were to conclude that the application can proceed under the Builder's Remedy, I would appreciate a reply to this email with citations supporting any such determination.

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We may have additional comments to offer after we know whether the County has deemed the application complete and, if not, what additional information is required. Similarly, we may offer additional comments after we know how the application will comply with CEQA.

Thank you again for the courtesy of our video call last Friday. I look forward to a timely reply to this email.

Sincerely,

Roy E. Brewer
Partner

Exhibit N

BREWER LOFGREN LLP

ATTORNEYS AT LAW
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CARMICHAEL, CA 95608

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June 9, 2025

Jonathan DiSalvo
Senior Planner
County of Santa Cruz
701 Ocean Street, 4th Floor
Santa Cruz CA 95060

Delivered by Email

Re: 3500 Paul Sweet Road

Dear Jonathan,

I appreciate the time you gave me in March and April related to the application for development of the parcel at 3500 Paul Sweet Road, and the time Ms. Kirkish spent with me on the telephone in response to my letter dated April 1st. I now have a better understanding of the history of that application and the timeline supporting the initial determination that the application qualified for the Builder's Remedy.

Notwithstanding that original determination, at least two points in my letter of April 1st remain unanswered, and as I noted in my telephone conversation with Ms. Kirkish, I have design considerations to bring to your attention. For purposes of this letter, I will begin with the design considerations and follow with the procedural and statutory points.

Design Considerations

1. The parcel as it now exists is elevated several feet above Paul Sweet Road and adding the height of a six or seven-story building to that base foundation presents at least two considerations:
    a. Shadows and shade cast from the apartment tower encroaching onto the Dominican Oaks retirement community parcel and buildings.
    b. The possibility of privacy intrusions from residents in the apartment towers viewing through residential windows in the retirement community.
2. Does the height of the proposed apartment tower and its highest point of human occupancy qualify as a high rise in California? If so, has the applicant

Exhibit N

incorporated the design considerations attendant to a high-rise? If the tower does not qualify as a high-rise, has the building design nevertheless accommodated structural and fire safety design elements? If not already addressed, will those safety design elements be a condition of approval?

3. How does the site design accommodate access to the site by firefighting equipment necessary to combat a fire in a multi-story residential tower?
    a. For example, can the entry and exit point(s) to and from Paul Sweet Road accommodate a ladder fire truck?
    b. Will local firefighting equipment, including ladder trucks, be able to reach the roof of the apartment tower in the event of a fire?
4. Can fire-fighting equipment, rescue and paramedic vehicles successfully maneuver around the site during a fire event having once gained access to the site and the residential apartment tower?
5. Will the apartment tower be sprinkled?
6. Will repeaters be required throughout the tower to ensure communication between firefighters and other first responders are not disrupted during a fire or other emergencies?
7. Will the power lines along Paul Sweet Road be placed underground or otherwise relocated to allow unimpeded access to the site and the residential tower by firefighting equipment, including ladder trucks?
8. Do the eucalyptus trees on-site and adjacent to the site represent a significant fire risk? Do those eucalyptus trees increase the risk of fire or the intensity of any fire that may occur on-site, endangering the residents in the apartment tower as well as property and people visiting or residing on adjacent parcels, including but not limited to, for example, the Dominican Oaks retirement community which is adjacent to the parcel on three sides?
9. In the event of a fire, what is the likelihood that hot or burning embers from eucalyptus trees on-site would be carried by wind from the parcel to adjacent properties and occupants, including but not limited to the Dominican Oaks retirement community? How will this risk of "explosive burning" be reduced by the applicant? See Gross, L. (June 12, 2013) "Eucalyptus: California Icon, Fire Hazard and Invasive Species." KQED.
10. Will the turning radius of fire trucks accommodate safe access to all four sides of the apartment tower and parcel and simultaneous access by separate fire

Exhibit N

trucks or other first responder vehicles to the adjacent Dominican Oaks retirement community?

11. Notwithstanding the characteristic of eucalyptus trees to pose a fire risk due to their flammability, eucalyptus trees are known to provide wintering habitat for Monarch butterflies. Have Monarch butterflies been seen visiting this grove of eucalyptus trees, such that removal of the grove to mitigate fire risk would be destructive of habitat for the Monarch butterfly?
12. Will the height of the apartment tower constructed on a parcel that is elevated from Paul Sweet Road interfere with helicopter access to the helipad at Dominican Hospital?
13. Will noise from helicopters flying to and from the hospital's existing helipad be disruptive to residents of the apartment tower given the height of the proposed residential tower?

Unanswered Questions from April 1, 2025, Letter and Email

My email and accompanying letter of April 1st raised a number of points with citations to state code and the County's webpage. Many of those questions have been addressed by you and Ms. Kirkish. Two points that have not yet been addressed are whether the amended application increased the number of units proposed by more than the 20 percent allowed by state code, and whether the application must comply with CEQA. Quoting from the April 1st letter:

a. The correct application date is not earlier than October 2, 2024.

   i. The initial application date, even if otherwise found to be consistent with SB 330, does not extend the Builder's Remedy to a revised application at the same address.
   ii. Sec. 8(c), amending Government Code Section 65941.1(c):
      1. "After submittal of all of the information required by subdivision (a), if the development proponent revises the project such that the number of residential units or square footage of construction changes by 20 percent or more…the housing development project shall not be deemed to have submitted a preliminary application that satisfies this section until the development proponent resubmits the information required by subdivision (a) so that it reflects the revisions." (emphasis added)

Exhibit N

2. What the County webpage describes as "an SB 330 preliminary application" was filed and fees paid on the application date of April 22, 2024, and reflected a six-story apartment building with 84 units. The project was revised to reflect a six-story building with 105 units, representing a 25% increase in the number of units proposed for the same address, 3500 Paul Sweet Road. [Sources: County webpage, CDI – Application Status, application number PA241023, dated April 22, 2024 (84 units); County webpage, Major Project Applications/Builder's Remedy, 3500 Paul Sweet Road address, History.]
3. You confirmed during our video call last Friday that the application now being reviewed comprises 105 units.
4. The application dated April 22, 2024, was revised to reflect a 25 percent increase in the proposed number of units, which exceeds the 20 percent noted in SB 330 Sec. 8(c) quoted above. The underscored text above from SB 330 Sec. 8(c) expressly states that in circumstances of a revised unit count equaling or exceeding 20 percent, the application "shall not be deemed" to be a preliminary application until such time as an application is resubmitted to reflect the revisions. That language renders the application date to be October 2, 2024, a full six months after HCD certified the County's Housing Element.
5. In these circumstances, too, the applicant is not able to invoke the Builder's Remedy.

2. **The application must comply with CEQA.**

Even if the application is otherwise found to satisfy the requirements of SB 330, nothing in SB 330 allows an application to avoid compliance with CEQA. See SB 330 Sec 3, amending Government Code 65589.5(e), and 65589.5(o)(C).

I understand and believe that HCD approved the Housing Element in August 2024 and backdated that acceptance to April 2024. If my interpretation of the state code quoted above is correct, the amended application constitutes a new application which, if submitted on October 2, 2024, falls outside the window of HCD's approval of the Housing Element in

Exhibit N

August of that same year. The Builder's Remedy would not apply to this application in that circumstance.

At least one local media source has noted that the applicant's CEO served on the County Planning Commission in 2024. See Neely, C. (December 16, 2024) "Workbench CEO Stepped Down From County Planning Commission Amid Growing Conflict Concerns." *Lookout Santa Cruz*. Mr. Gordin's tenure on the commission is coincident with the filing of this application and with the planning commission deliberations amending the county zoning code in an apparent attempt to avoid CEQA compliance for certain multi-family residential development applications. Did Mr. Gordin or any representative of his have any conversations with county staff, including staff in community development, planning, and county counsel's office, regarding the strategy of CEQA avoidance for multi-family residential development applications?

Lastly, has the California Attorney General opined on the efficacy of amending a local zoning code to create a Ministerial Combining District exempting certain multi-family residential applications from CEQA without benefit of an exemption specified in the California Public Resources Code or the CEQA Guidelines?

I would appreciate a written reply, either by letter or by email. Please confirm the County's determination about the applicability of CEQA to this application.

Thank you in advance for your consideration.

Sincerely,

Roy E Brewer
Partner

Cc: M. Machado, Director, Community Development & Infrastructure
N. Kirkish, County Counsel's office

Exhibit N

2 December 2025

Jonathan DiSalvo
Planning Department
701 Ocean Street, 4th Floor
Santa Cruz, CA 95060
(831) 454-3157 jonathan.disalvo@santacruzcountyca.gov

Response to Nov 21, 2025 at 3:39 PM email Clay Toombs to Amy Saulnier and Rachel Howley concerning the height of the building and its proximity to the hospital heliport

In the above noted email Clay cites Figure 2-20 on Page 2-36 of a publication that shows the Heliport Protection Zone design: https://www.faa.gov/documentLibrary/media/Advisory_Circular/AC_150_5390_2D_Heliports.pdf.

Figure 2-20 (below) is a requirement for the planning, design and construction of heliports achieved through heliport owner control over the HPZ and has nothing to do with the construction of a building near an existing heliport.

Clay uses this figure and its 8:1 approach/departure surface to claim that

> *"the proposed building would be below the approach/departure surface, even if helicopters for some reason chose to fly directly over the existing Dominican Oaks community and the proposed new building".*

The section of FAA Advisory Circular AC 150/5390-2D that applies to Workbench's project is section 1.11 **Hazards to Air Navigation.** Workbench's 3500 Paul Sweet Road project fits Example 1 of Figure 1-4 (below) and as such requires notice to the FAA. Example 1 is a building less than 200 feet (ft) (61 meters (m)) in height, but top will penetrate the 25:1 surface (notice required by § 77.9).

Note the 25:1 surface, not an 8:1 surface. The graphic below delineates the effect of the two surfaces on the proposed construction.

Clay then notes:

> *"We are aware that FAA Form 7460-1 will need to be filed. That form is here: https://www.faa.gov/documentLibrary/media/Form/FAA_7460-1.pdf*
> *The filing of the form is to be done on the same date as the construction permit application is filed, or 45 days before start of construction, whichever is **earlier**. The heliport is privately-owned and private use, but we are aware that that heliport has a private RNAV instrument approach and departure, and that the form must be filed".*

We concur with this, but Clay goes on:

> *"This form is so that the FAA can issue a Notice to Airmen (NOTAM) https://www.faa.gov/about/initiatives/notam/what_is_a_notam about the construction,*

Exhibit N

and so that they can add the new structure to aeronautical charts. It is not a form that requires any approval for the construction. This is about making the FAA and pilots aware that construction will be happening in the vicinity of the helipad"

This is not quite correct. Neither FAA Regulation part 77.9 nor Advisory Circular AC 150/5390-2D directly requires the issuance of a NOTAM. Rather, The FAA requires that it be notified of specified obstructions via Form 7460-1. The FAA then conducts aeronautical studies to determine the physical and electromagnetic effect on the use of navigable airspace. In the meantime section 1.11.1.1 states:

"Presume these objects to be hazards to air navigation unless an FAA study determines otherwise"

Section 1.11.2. offers the following hazard mitigation options:

1. Remove the object
2. Reduce its height
3. Mark or light the object provided an FAA aeronautical study has determined that the object would not be a hazard to air navigation if it were marked and/or lighted

Clay then states:

"I have shared this same information with the County and suggested that a Condition of Approval be placed on the project to the effect that "The FAA shall be notified in advance of any construction or alteration of the approved project as required by the Federal Aviation Regulations, including filing of FAA Form 7460-1 in accordance with all its requirements. FAA Form 7460-1 shall be included with any and all applications to the County building department for construction or alteration of the approved building."

We expect that this will be followed and will be included in the Conditions of Approval for the project and that the project can not start until the FAA has completed its aeronautical studies and has that the proposed construction is not a hazard to air navigation.

Finally Clay states:

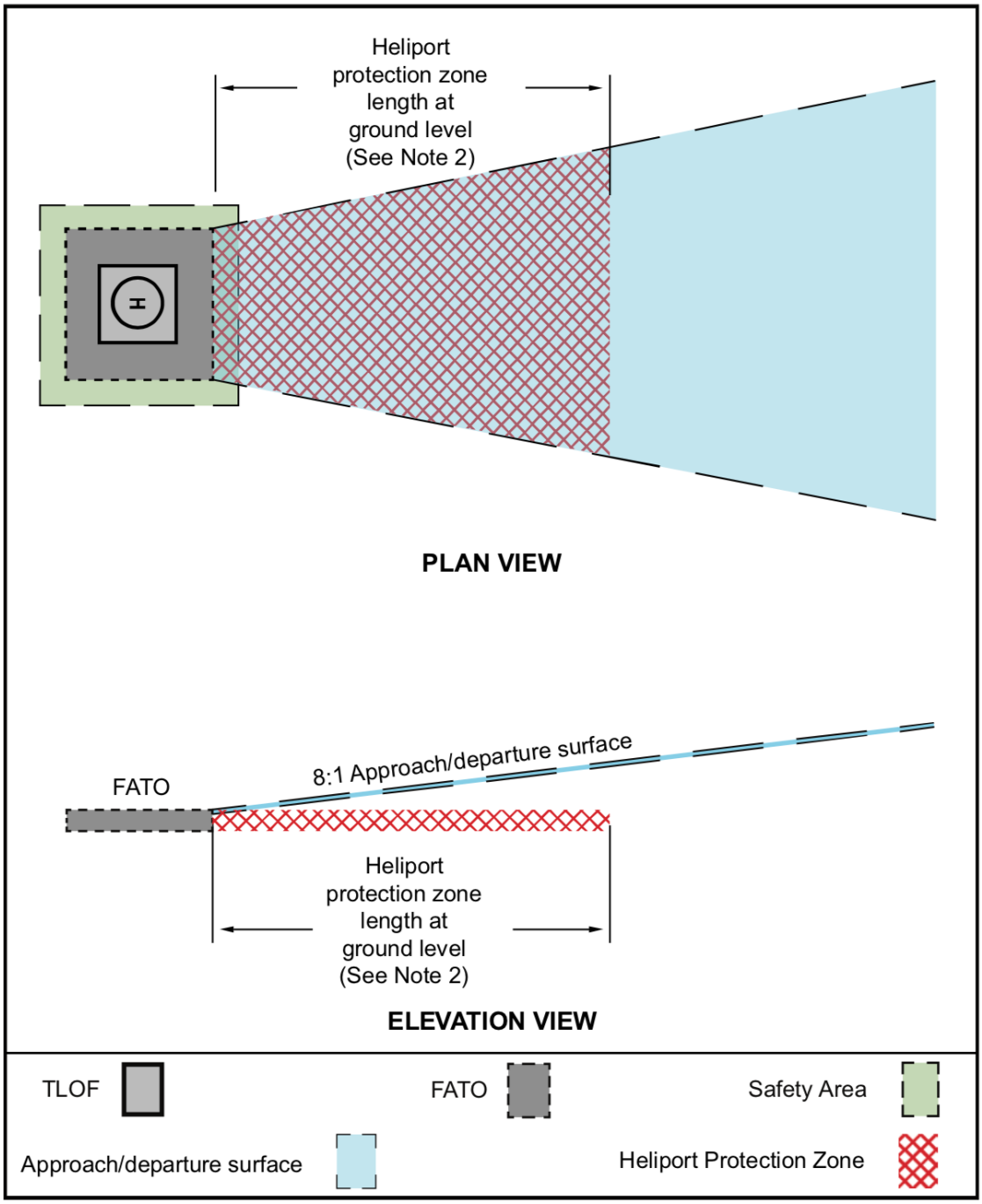
"To be clear, the form does not get filed at the Planning approval stage. It is to be filed when we apply for building permit. Nothing about the form or the FAA regulations requires approval of the project or its height".

We agree that the form must submitted "at least 45 days before the start date of the proposed construction or alteration or the date an application for a construction permit is filed, whichever is earliest" per FAA part 77.7.

But it is clear in FAA Advisory Circular AC 150/5390-2D section 1.11 that the required FAA aeronautical studies may have an impact on the construction. These studies assume that the proposed construction is a hazard and then attempt to show otherwise.

Exhibit N

Figure 2-20. Heliport Protection Zone (HPZ)

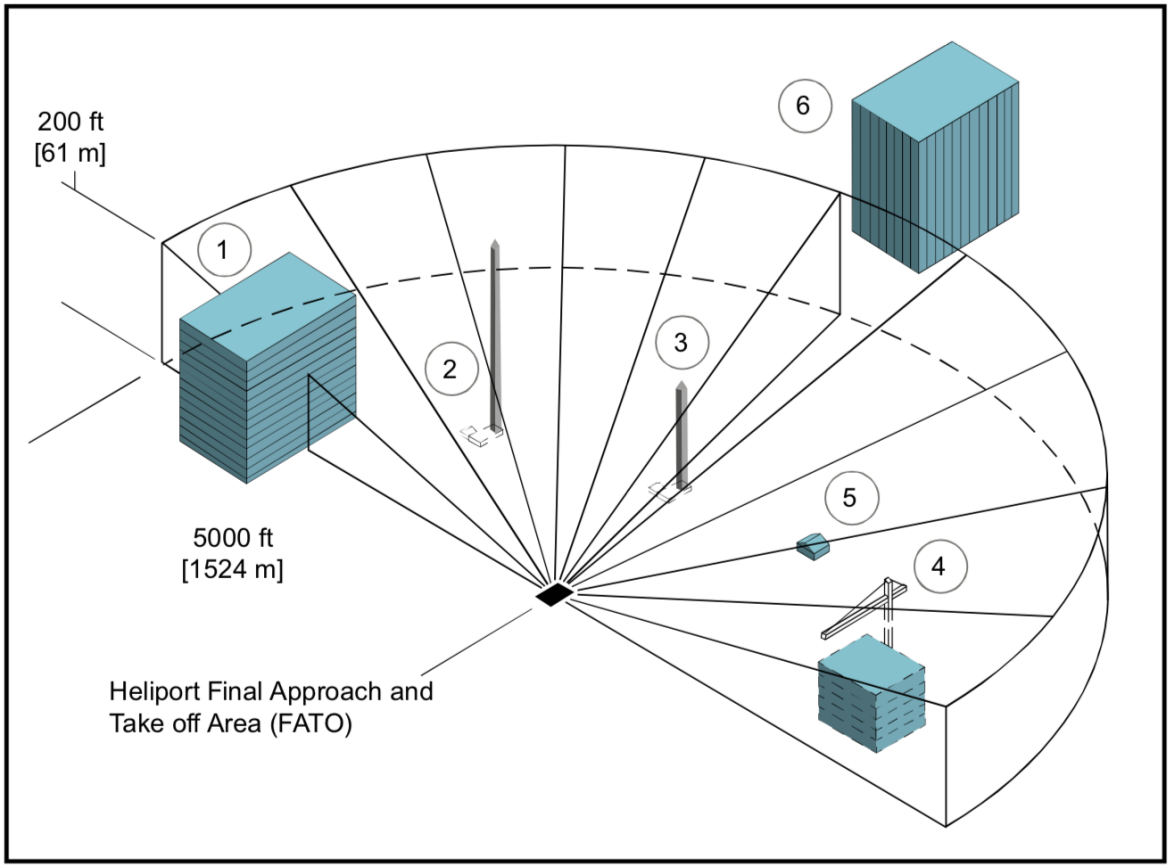


Note 1: The approach surface starts at the edge of the FATO.
Note 2: The length of the Heliport Protection Zone is 400 ft (122 m) for TRANSPORT heliports and 280 ft (85 m) for GENERAL AVIATION and HOSPITAL heliports.
Note 3: See paragraph 2.12 for approach surface dimensions.
Note 4: See paragraph 2.13 for specific HPZ recommendations.

Figure 1Heliport Protection Zone

Exhibit N

Figure 1-4. Offsite Development Requiring Notice to the FAA



Note: Notice under Part 77 is required for all public-use heliports or private-use heliports with at least one FAA-approved instrument approach procedure.

Offsite Development Examples for Figure 1-4:

① Building is less than 200 feet (ft) (61 meters (m)) in height, but top will penetrate the 25:1 surface (notice required by § 77.9).

② Antenna is over 200 ft (61 m) in height (notice is required by § 77.9(a)).

③ Antenna is less than 200 ft (61 m) in height and penetrates the 25:1 surface (notice is required by § 77.9(b)(3)).

④ Construction crane penetrates 25:1 surface (notice is required by § 77.9(b)(3)).

⑤ Building is less than 200 ft (61 m) in height and does not penetrate the 25:1 surface (notice is not required).

⑥ Building is more than 5,000 ft (1,524 m) from heliport (notice is required if building will be 200 ft (61 m) or more in height).

Figure 2 Hazards Requiring Notice

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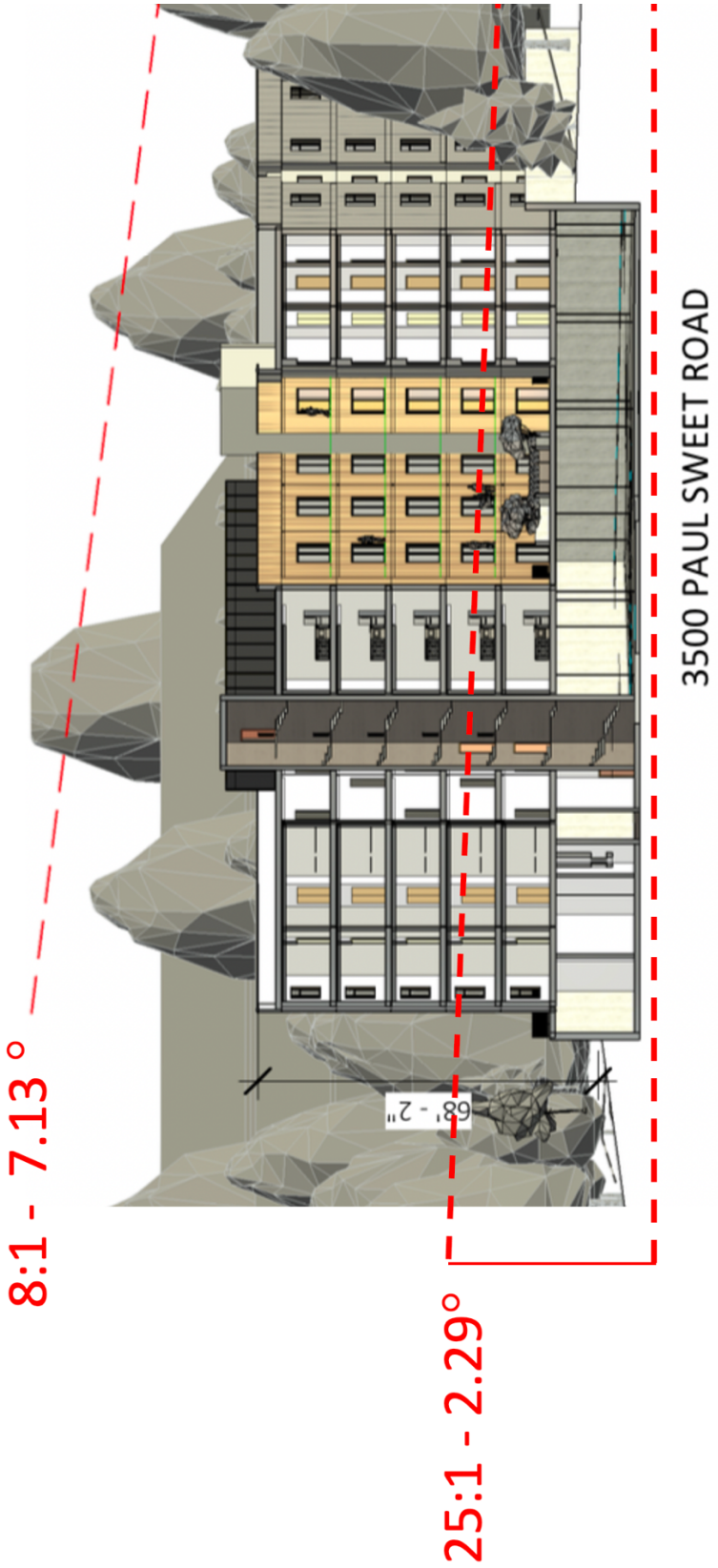

Figure 3 25:1 Versus 8:1 Slope

Exhibit N

Jonathan DiSalvo

From: Virginia Lieb <virginia@lieb.com>
Sent: Friday, December 12, 2025 11:59 AM
To: s.pavonetti@gmail.com; rizcon@earthlink.net; Jesse Nickell; janerbarr@aol.com; Trina Barton; Sandy Brown; yeseniajduran@gmail.com; kami@davidlyng.com; renee@reneesgarden.com; jagomez173@gmail.com; Jamie Sehorn; Suzanne Ise; housing@hacosantacruz.org; Jonathan DiSalvo; Manu Koenig; Second District; Justin Cummings; Felipe Hernandez; Fifth District
Subject: Multiple legitimate reasons to deny approval of the project at 3500 Paul Sweet Road.

Follow Up Flag: Follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

To all Supervisors and members of the Planning Commission:

This lengthy letter addresses multiple legitimate reasons to deny approval of the project at 3500 Paul Sweet Road. Before you decide on the fate of this project, please review and consider all this information:

Santa Cruz County can deny or condition Builder's Remedy projects under specific circumstances outlined in state law:

1. The housing project pose an unmitigable, adverse impact on public health or safety.

2. The denial or condition is required to meet state or federal law, and there is no feasible method to comply without making the development unaffordable.

Source:
https://cdi.santacruzcountyca.gov/UPC/GetInvolved/MajorProjectApplications/BuildersRemedy.aspx#:~:text=To%20address%20the%20statewide%20housing,without%20making%20the%20development%20unaffordable.

The following are just some of the many conditions under which denying approval is legal:

1. Public Health & Safety Impacts

a) Evacuation and firefighting dangers

· Bryan Gage - Battalion Chief, City of Greenfield Fire Dept. analyzed and made the following statement Regarding the 3500 PSR Proposal.

Exhibit N

- Evacuation Challenges: Bryan's review of the site plan indicates that the proposed development offers no viable solution for area evacuation. This deficiency would directly compromise life safety during an emergency for Dominican Oaks, Dominican Hospital, and the surrounding areas.

- Proximity and Collapse Zone Risk: The proposed development's close proximity to Dominican Oaks places Dominican Oaks within a "collapse zone" during a catastrophic emergency. This significantly amplifies the existing life safety concerns associated with the site.

- Fire Apparatus Access and Operations:
    - In Bryan's professional opinion, a fire apparatus responding to either the proposed development or Dominican Oaks would severely impede access for other emergency vehicles needed for evacuation or medical care.
    - Furthermore, he advises against positioning a fire truck between the proposed development and Dominican Oaks due to its location within the collapse zone, which would expose the emergency response team to unacceptable risk.

B)_ No Fire Review from Central Fire District

- Workbench claims that Central Fire has completed its review and that all compliance items have been resolved. On December 3, we asked your office to provide us with a copy of the fire review and if any compliance items remain, please provide them. We have not received this fire review.

- In the June 13, 2025 *County of Santa Cruz Complete Application Submittal* there is no mention of the Fire Review.

c) Chip Bogaard addresses health & safety issues

- Mr. Chip Bogaard, with over 40 years of experience in the construction industry submitted a letter regarding the proposed development at 3500 Paul Sweet Road, adjacent to Dominican Hospital and Dominican Oaks. His analysis raises several critical life-safety and infrastructure concerns that deserve careful consideration before any decision is made on this project.

- Dominican Hospital and Dominican Oaks serve as essential pillars of the Santa Cruz community, providing acute-care services, long-term support, and a safe living environment for some of our most vulnerable residents. Any development in close proximity to these facilities must be designed with the highest standards of safety, compatibility, and operational independence.

Exhibit N

- Mr. Bogaard identifies several key issues in the current proposal:
- **Emergency access and egress risks**, including fire-apparatus staging that would block Dominican Oaks' only driveway—compromising evacuation capability for seniors with mobility limitations.
- **Intended use of Dominican Oaks' private fire hydrant and water system**, which poses unresolved engineering and operational risks and could impact fire-flow availability for the facility.
- **Severe fire-exposure concerns** due to the proposed 82-foot structure being built right next to the property line, creating significant radiant-heat, debris, and evacuation hazards.
- **A building mass vastly out of scale** with the surrounding healthcare and senior-living environment, directly affecting safety, emergency response, and neighborhood character.
- **Inappropriate reliance on Dominican Oaks' private property and infrastructure**, which Dominican Oaks is not obligated—and cannot safely be expected—to support.
- Mr. Bogaard calls for a responsibly designed project that protects current residents, aligns with local infrastructure capacity, and maintains the safety and operational integrity of Dominican Hospital and Dominican Oaks.

d) Health & Safety issues during Construction of 3500 PSR

- Seniors can request reasonable accommodations from the County to mitigate negative impacts (e.g., noise, dust, blocked access during construction) on their ability to live in their own homes, even if those homes aren't part of the project. If the project creates barriers to accessing their homes or public spaces, it endangers the safety and health of residents next door.

2. 3500 PSR Not meeting state or federal laws.

a) <u>FAA height requirements of buildings near Heliports</u>.

- Section 1.11 of the FAA AC states that Notice under Part 77 is required if building top will penetrate the <u>25:1 </u>surface.
- 25:1 surface applies up to 5,000 ft from heliport
- 3500 PSR is 834 feet from helipad, thus a height of 33 feet (3 stories) is the maximum height allowed for this project.
- FAA presumes this project to be hazardous to air navigation unless an FAA study determines otherwise.

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b) ADA (Americans with Disabilities Act)

Senior disabled people in a retirement facility are protected under federal disability and housing laws, and a builder's actions creating dangerous conditions may violate these laws. The key laws that apply are under Title III of the Americans with Disabilities Act (ADA).

- Protection against Dangerous Conditions: If a builder's actions, such as construction next door, create hazardous conditions that disproportionately endanger disabled seniors (e.g., blocking accessible routes or creating excessive noise/vibration/airborne dust and pollution that impacts health conditions), this could be considered a failure to provide equal access or a failure to make reasonable accommodations under the FHA/ADA.

- Seniors with impairments like limited mobility, vision/hearing issues, or chronic conditions are defined as individuals with disabilities under these acts and are therefore entitled to protection.

c) Dominican Oaks eligible for CEQA protection as a sensitive receptor location

Sensitive receptors are places where people, especially those who are more susceptible to the effects of environmental hazards (like air pollution, noise, or safety risks), live, work, or visit. This includes:

o A retirement community providing both independent and assisted living options.

  o Houses older adults, many of whom have health conditions, use mobility aids, or require assistance (such as those in assisted living with 24/7 care staff), making them more vulnerable during emergencies.

  o Located next to a hospital, which has an active heliport, needs emergency evacuation routes.

  Due to the nature of its residents and the services it provides, Dominican Oaks is treated as a location requiring special consideration in environmental and planning decisions to ensure the safety and well-being of its vulnerable population.

d) Workbench potentially liable under elder abuse laws & can be charged with reckless endangerment

Exhibit N

- A builder could be liable for **elder abuse and neglect** in California if their actions, such as blocking escape routes, endanger seniors. A builder's actions could lead to severe civil liability and criminal charges under elder abuse laws for creating a dangerous situation, especially when building near a senior community. The fact that the victims are vulnerable seniors in a retirement community will be a key factor in demonstrating the builder's awareness of the potential harm and the severity of their disregard for that harm.
- A builder in California can be charged with reckless endangerment of senior citizens if they willfully or negligently place an elder in a situation where their health or safety is endangered, likely leading to great bodily harm or death
- This can include actions like causing unsafe conditions that the builder knew or should have known because the victims are elder or dependent adults. Examples of such behavior include creating hazardous environments, ignoring known safety risks, or failing to take necessary precautions that could lead to injury or death.
- A builder's failure to provide adequate room for firefighting equipment is a serious building and fire code violation in California, which can be reported to local authorities. Such actions may fall under related offenses, particularly those involving elder abuse.

Respectfully submitted,

Virginia Lieb
Resident, Dominican Oaks Retirement Community
484-678-8301
Virginia@Lieb.com

Exhibit N

November 16, 2025

To: Trina Barton, Chair, Santa Cruz County Planning Commission

From: Margit Aramburu, Dominican Oaks resident

Subject: Comments on 3500 Paul Sweet Road Proposed Project; Application #241360

My understanding is that currently in California, a county can only turn down a "Builder's Remedy" project under very narrow and specific circumstances. A county may be able to reject or delay such a project if it poses ***a specific, unmitigable health or safety risk***.

While the proposed project is creative and interesting, at the proposed site, the proposed project does pose several specific, unmitigable health and safety risks. No amount of additional data development would address or resolve the following issues:

Paul Sweet Road is unsafe for use by large construction vehicles needed to excavate the site to street elevation as proposed. Paul Sweet Road is posted no exit and no truck turn around. The application states over 10,500 cubic yards would be removed from the site.

Paul Sweet Road is unsafe for delivery and or storage of construction materials needed to create forms for the concrete structure proposed for the parking facility.

Paul Sweet Road is unsafe for location of concrete delivery trucks would be needed to create the parking facility.

Paul Sweet Road is unsafe for location of a project office structure typically used on major construction projects, due to its narrow width.

Paul Sweet Road is unsafe for parking of construction staff vehicles; parking is only allowed on one side of the road and only during daylight hours. There are no available on street parking spaces under current uses.

Paul Sweet Road is unsafe for the large vehicles that will be needed to deliver the prefabricated units.

Paul Sweet Road is unsafe for a large crane that will be needed to install the prefabricated units.

In addition, the proposed excavation will create unmitigable adverse impacts on the approximately 225 residents and numerous employees of Dominican Oaks due to creation of dust; the units have no air conditioning or air filters and temperatures in the units are largely controlled by opening and closing the window and sliding doors. In addition, three meals a day are prepared, served, and consumed each day at Dominican Oaks in spaces that again commonly open windows and doors for ventilation.

Exhibit N

In addition, the proposed excavation will create unmitigable adverse impacts on the approximately 225 residents and numerous employees of Dominican Oaks due to noise generation throughout the construction period and thereafter when residents occupy the many residential units proposed at 3500 Paul Sweet Road.

In addition, the proposed project includes very limited parking and may generate traffic in the form of on demand rides, and/or delivery of goods, products and services to the building and the residents. Again, Paul Sweet Road is not capable of accommodating large vehicle such as buses, or large delivery trucks, nor are there bike lanes.

In addition, the proposed project does not include normal amount of space or turnaround to accommodate fire vehicles in case of a fire, or other emergency. Paul Sweet Road is not capable of accommodating large fire vehicles. While the applicants appear to propose access to the Dominican Oaks driveway and fire road to meet fire truck access to the rear and sides of the building, any such proposed would put Dominican Oaks structures and tenants in danger during an emergency situation and should be preserved only for use by Dominican Oaks.

In summary, I recommend denial of the proposed project based on its unmitigable health and safety risks to the residents of Dominican Oaks, and to any potential residents if the proposed project if built as currently proposed.

Margit Aramburu

3400 Paul Sweet Road, Unit A310

Santa Cruz, CA 95065

Cc: Donovan Arteaga, Planning Division

Jonathan DiSalvo, Senior Planner

Supervisor Manu Koenig, District 1

Exhibit N

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Margit Aramburu

3400 Paul Sweet Road, Unit A310

Santa Cruz, CA 95065

Cc: Donovan Arteaga, Planning Division

Jonathan DiSalvo, Senior Planner

Supervisor Manu Koenig, District 1

Exhibit N

Jonathan DiSalvo

From:	Roy Brewer <rbrewer@brewerlofgren.com>
Sent:	Wednesday, December 31, 2025 10:58 AM
To:	Jane Barr (alternate); Jenni Gomez (alternate); Jesse Nickell; Kami Bachir (alternate); Luke Rizzutto, Jr. (alternate); Renee Sheperd; Sandy Brown; Shane Pavonetti; Trina Barton; Yesenia Jimenez (vice chair)
Cc:	Jonathan DiSalvo; Natalie Kirkish; Donovan Arteaga
Subject:	Opposition to 3500 Paul Sweet Road - Parking Part 1
Attachments:	SC Demographics No Vehicles + Avg Vehicles Jul 2025.pdf; SC Demographics How People 30 Dec 25.pdf; No Parking PSR 18 Nov 25.pdf; Ambulance Parking PSR 18 Nov 25.pdf; Distance to Hospital Parking 26 Dec 25.pdf
Follow Up Flag:	Follow up
Flag Status:	Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

This firm represents Dominican Hospital, the primary heart and stroke healthcare center for the county, and the Dominican Oaks retirement community, a 206-unit community with 216 residents having an average age of 88. We write again today in opposition to the proposed 105-unit residential tower at 3500 Paul Sweet Road. This email is the first of two addressing parking.

Applicant's Plans Submittal Requests a Parking Standards Waiver to Zero Spaces

The applicant's proposed development of a 6-story residential tower having 105 units requires 147 parking spaces per County Code (see Sheet GP0.02 of Applicant's submittal. Note that the math on this sheet is incorrect: 247 spaces should be 147 spaces). The applicant asserts an alternative parking requirement is for 113 spaces relying on the State Building Density Law (see Sheet GP0.02 of Applicant's submittal). The applicant is requesting a waiver of **all** parking requirements and expressly demands zero (0) spaces:

> "The parking required for the project by Santa Cruz Municipal Code (CMC) shall be reduced to zero (0) spaces…the development permit approval for this Project shall not require the project to provide any parking spaces." (emphasis added) (source: Sheet GP0.01 of Applicant's submittal, note 3)

The applicant expresses an intent to provide 68 parking spaces but insists on the waiver to zero (0) spaces, with no assurances that the intent to provide even 68 spaces will be fulfilled. (source: Sheets GP0.01 and GP0.02 of Applicant's submittal) This expression of intent may be an attempt by the applicant to encourage as a condition of approval a lesser parking requirement than even the Density Bonus law allows.

The applicant argues that the cost of parking spaces is prohibitive and would be a financial burden to the applicant's provision of a mere six (6) affordable housing units, representing less than six

Exhibit N

percent (< 6%) of the 105-unit residential tower. (source: Sheet GP0.01 of Applicant's submittal, note 3 and the adjacent narrative and table addressing "Below-Market-Rate Units Proposed") The applicant asserts that they can claim a financial burden without providing evidence substantiating same: "SDBL does not permit a jurisdiction to require any documentation for a waiver." (see Sheet GP0.01 of Applicant's submittal, "Waivers / Reductions of Development Standards") (emphasis added) The applicant's assertion is contrary to the plain language of the Density Bonus law:

> "This subdivision does not prohibit a local government from requiring an applicant to provide reasonable documentation to establish eligibility for a requested density bonus…and parking ratios…" (Government Code Section 65915(a)(2)) (emphasis added)

In addition: a local government may deny a concession or incentive if:

> "based upon substantial evidence" the concession or incentive would not result in "identifiable and actual cost reductions, consistent with subdivision (k), to provide for affordable housing costs…or for rents for the targeted units…" (Government Code Section 65915(d)(1), "Density Bonuses and Other Incentives" (2024)) (emphasis added)

The applicant must demonstrate with specificity the actual cost reductions that would result from the county's approval of any waivers and concessions requested, and how those actual cost reductions, if any, allow the applicant to subsidize the proposed affordable housing units. Refusal by the applicant to provide such identifiable and actual costs to the county, rather than mere claims of unaffordability, renders an informed decision by the county about the entire application impossible, including the requests for concessions, incentives, or waivers. Anything less than an informed decision is contrary to established public policy.

Similarly, the county may deny such a request if approval would result in an adverse impact to public health and public safety. (Ibid) We have introduced into the record a variety of adverse public health and public safety impacts associated with the concessions, incentives, and waivers requested by the applicant for the proposed residential tower.

The applicant's reasoning is presented as a *fait accompli*, arguing that the county is obligated to accept the waiver and incentive requests ("shall be reduced" and "shall not require") based on applicant's interpretation of state legislation and the state Government Code. (source: Sheet BP0.01 of Applicant's submittal, note 3) This, too, is contrary to the characterization in the Government Code of incentives and concessions as "a proposal…that the applicant requests…" (Government Code Section 65915(d)(1))

Requiring Parking Spaces On-Site does not Physically Preclude Construction of the Proposed Development

The Government Code section and case law noted in the submittal under "Waivers / Reductions of Development Standards" speaks to "physically precluding the construction" of a development qualifying for the Density Bonus law as designed by an applicant. (see Sheet GP0.01 of Applicant's submittal). A condition of approval consistent with established objective policies and standards, and particularly policies and standards related to public safety, arguably may create a financial challenge for any applicant but does not give rise to a physical impediment precluding construction. If the legislature had intended to include financial constraints to construction, the legislation would have clearly stated

Exhibit N

such. Instead, the plain language of the legislation and case law narrows the scope to "physically precluding construction." The applicant is attempting to convert a financial impact into a physical constraint.

Fewer Parking Spaces On-Site does not mean Less Traffic

The applicant has suggested in public testimony (Board of Supervisors hearing of December 9, 2025) that providing fewer parking spaces will result in fewer cars and less traffic congestion. We believe the statement is not consistent with reality and is not supported by any objective standards or other evidence in the record. The applicant's statements are mere expressions of opinion and preferences, however strongly worded and presented, and the applicant's preferences alone cannot be the basis for approval. Citations of policies and standards in support of the applicant's statements are necessary. See the reference above to "reasonable documentation."

We have found evidence that Santa Cruz residents have on average 2.1 cars per household, higher than the state average of 2.0 cars per household and, further, that only 6.03 percent of Santa Cruz County households have no vehicles. (see "SC Demographics No Vehicles" (updated July 2025) (attached) In addition, approximately ninety percent (~90%) of the county's population rely on personal vehicles for transportation, and only 2.2 percent rely on bus. (see "SC Demographics How People," attached)

It is not reasonable to presume that a substantial percentage of the tenants in a rental residential development at the edge of urban development in a county in California will not have vehicles. It is certainly not reasonable to approve a rental residential development based on that presumption and assertion by the applicant without investigation and reasonable documentation.

The applicant is asking for concessions and waivers to reduce the parking obligation to 68 spaces, a marked deviation from the standards existing in the code and established based on decades of experience planning for the safe accommodation of population growth and the accompanying development in the county. If the County Code, based on those decades of experience, requires 147 parking spaces and the applicant's demand for a waiver to provide zero parking is approved, where will the demand for the remaining 79 parking spaces be satisfied?

Even if the 113 spaces purportedly required under the Density Bonus law (see Sheet GP0.02 of the Applicant's submittal) are allowed instead of the County Code standard, where will the balance of the cars associated with the 105 residential units be parked – approximately 45 vehicles?

Public Safety Consequences of Insufficient Parking

Parking along Paul Sweet Road (henceforth "PSR") is allowed on the west side only (adjacent to the cemetery) and is not allowed between midnight and 6:00 AM (see "No Parking PSR" photo, attached). Parking along the west side of PSR is already a challenge even without the proposed 105-unit residential tower, as evinced by photos taken at 8:00 AM on a Tuesday morning in November 2025. Ambulances are often parked on the west side of PSR now, as seen in the photos (see "Ambulance Parking PSR" photo, attached). If parking along Paul Sweet Road is currently not allowed between 12:00 midnight and 6:00 AM, will the public safety reasons associated with that regulation be changed with the construction and occupancy of the proposed residential tower?

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If PSR is widened by the applicant as a Condition of Approval, and subsequently parking is allowed on one or both sides of a widened PSR, it is unlikely that there will be enough spaces to accommodate off-site parking for any substantial number of cars associated with the proposed residential tower. How will off-site parking be accommodated for the estimated 79 car shortfall from that required by county code?

Insufficient on-site parking gives rise to parking long PSR and intrusions into parking reserved for residents, family and guests at Dominican Oaks and Dominican Hospital, as well as visitors to Oakwood Memorial Park. Ambulance crews often attempt to park in the private spaces at Dominican Oaks. One can logically anticipate conflicts between residents of the proposed residential tower with zero or insufficient parking and the residents and guests of Dominican Oaks and families and friends visiting the graves of loved ones at the cemetery.

Similarly, one can logically anticipate residents of the proposed residential tower parking, or attempting to park, in the hospital parking lot approximately 1,450 feet away from the proposed tower. (see "Distance to Hospital Parking," attached) In every instance, the towing of those vehicles parked illegally will create frustration and conflict within the neighborhood.

Conclusion: Deny the Project

For all the compelling reasons and objective policies and standards related to public health and public safety cited above and in earlier emails, we urge you to deny the project. In the event you lean towards approval, we urge you to condition approval on the satisfaction of all public health and public safety issues before issuance of any earth moving or building permits. Public safety is of paramount priority, especially given the proximity of the proposed tower to the elderly residents of Dominican Oaks and patients at Dominican Hospital, the heart and stroke healthcare center for the entire county.

An approval without conditions has significant and unavoidable consequences to the vulnerable elderly residents of the adjacent Dominican Oaks community; the patients, visitors, and staff at Dominican Hospital; anyone travelling by any means along Paul Sweet Road, and particularly to fire fighters and other first responders; and the county taxpayers.

Roy E. Brewer
Master of Laws (LLM) in Dispute Resolution

BREWER LOFGREN LLP
ATTORNEYS AT LAW

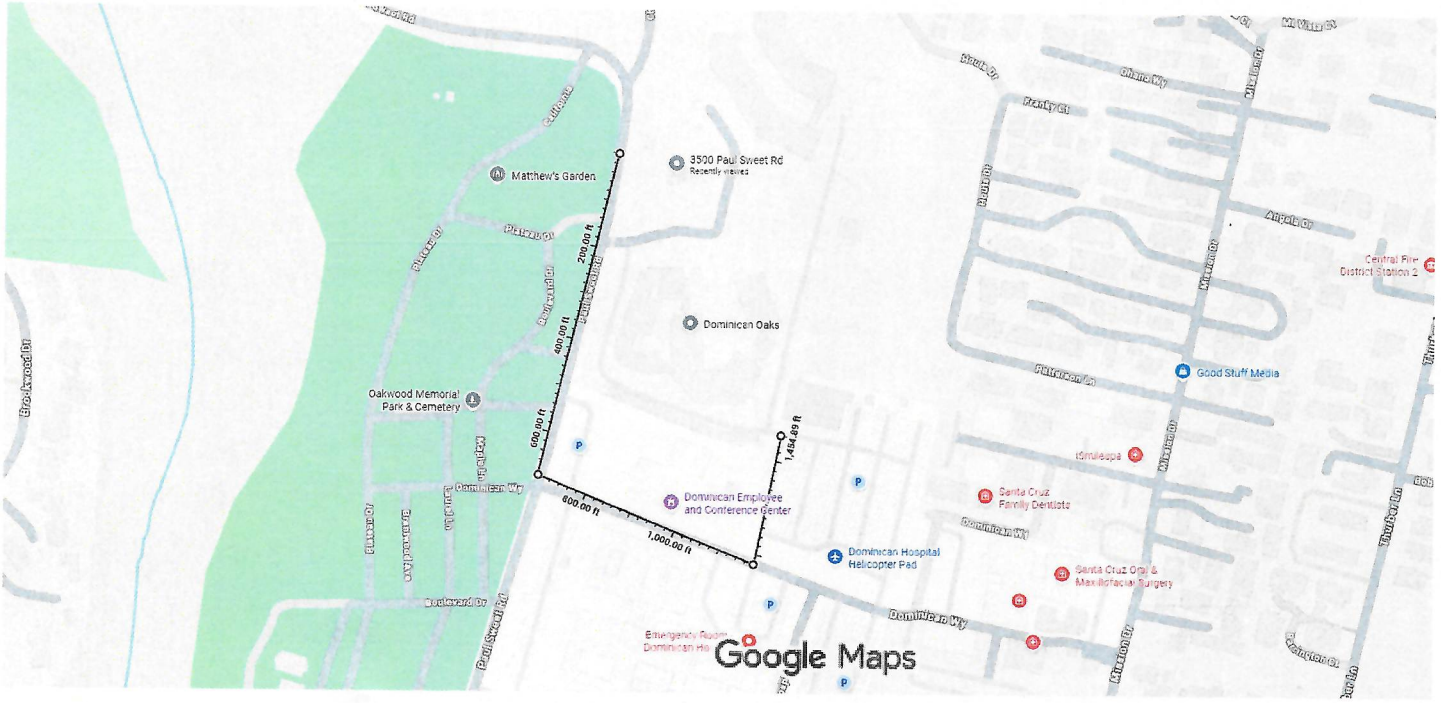
Carmichael & Folsom California
916.425.4477 Mobile www.brewerlofgren.com

Exhibit N

Exhibit N

Google Maps

3500 PSR tpo Dominican Way to first parking lot = 1,455 feet = 0.28 miles



Imagery ©2025 , Map data ©2025 Google 100 ft

Measure distance
Total distance: 1,454.89 ft (443.45 m)

Exhibit N

Transportation in Santa Cruz County

How people get around in Santa Cruz County

In Santa Cruz County, the average commute time is **150 minutes**. Commuting methods vary: **89.8%** of residents travel by personal vehicle and **5%** prefer to walk, while the remaining share relies on public transit or on two wheelers to get from A to B.

Commute time

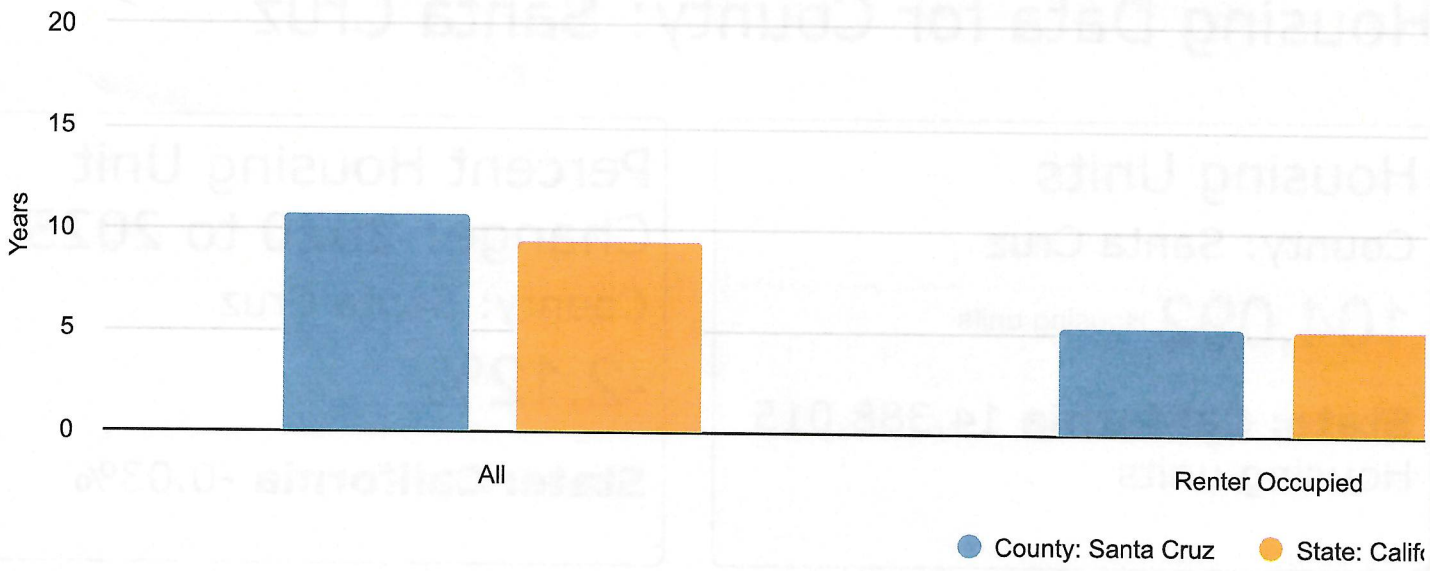
150 min

Means of transportation

	Value	Percent	YoY change
Car	98,403	89.8%	↘ -2.8%
Taxicab	84	0.1%	↘ -2.3%
Bus or trolleybus	2,355	2.2%	↗ 3.1%
Railroad	49	0%	↘ -2.0%
Motorcycle	581	0.5%	↗ 7.6%
Bicycle	2,643	2.4%	↗ 4.1%
Walk	5,525	5%	↘ -7.8%

Median Length of Residence

County: Santa Cruz



Median Length of Residence	County: Santa Cruz Years	State: California Years
All	10.8	9.4
Renter Occupied	5.3	5.2
Owner Occupied	16.8	14.4

Occupied Housing Units: No Vehicles

County: Santa Cruz

5,555 Housing units (6.03% of Occupied Housing Units)

State: California 931,504 Housing units (7.01% of Occupied Housing Units)

Average Number Vehicles Available

County: Santa Cruz

2.1 Vehicles

State: California 2.0 Vehicles

Demographics information provided by Claritas, updated July 2025, under these terms of use.

Exhibit N

Jonathan DiSalvo

From:	Roy Brewer <rbrewer@brewerlofgren.com>
Sent:	Wednesday, December 31, 2025 2:26 PM
To:	Jane Barr (alternate); Jenni Gomez (alternate); Jesse Nickell; Kami Bachir (alternate); Luke Rizzutto, Jr. (alternate); Renee Sheperd; Sandy Brown; Shane Pavonetti; Trina Barton; Yesenia Jimenez (vice chair)
Cc:	Jonathan DiSalvo; Natalie Kirkish; Donovan Arteaga
Subject:	Opposition to 3500 Paul Sweet Road - Parking Part 2
Attachments:	No Truck Turnaround PSR 20 Dec 25.pdf; Randy Krassow Email 08 Dec 25.docx; Paul Angelo Email 01 Dec 25.docx; SC Metro Headways 11 Sep and 18 Dec 25.pdf

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

As you recall from earlier emails, this firm represents Dominican Hospital, the undisputed primary heart and stroke healthcare center for the county, and the Dominican Oaks retirement community, and 206-unit community with 216 vulnerable, sensitive receptor residents having an average age of 88. We write again today to reiterate opposition to the proposed 105-unit residential tower at 3500 Paul Sweet Road. This email is the second of two emails addressing the public safety issues arising from insufficient on-site parking being proposed by the applicant.

The Applicant's Attempt to Shift the Responsibility and Costs for Parking to Others is Unacceptable

Nowhere in the legislation is it written that the applicant can unilaterally and arbitrarily dictate or limit the terms of the conversation with the county. Nowhere is it written that an applicant can claim financial infeasibility or hardship related to proposed condition of approval without providing substantial, verifiable evidence to support that claim. See the citations provided in the earlier email to "reasonable documentation" and "identifiable and actual cost reductions." The absence of such evidence exposes the claims as expressions of unsubstantiated opinion and the applicant's preference and cannot be relied upon as part of your decision-making process.

The applicant's insistence on an undocumented financial burden is a transparent attempt to shift the financial cost of providing adequate parking, based on the decades of experience resulting in the requirements of the county code, from the applicant to:

a. neighboring properties, including the vulnerable elderly residents of Dominican Oaks
b. the families of residents living at Dominican Oaks
c. the staff at Dominican Hospital, who will be forced to compete for parking spaces with the tenants of the residential tower, exacerbating an already stressed parking infrastructure
d. the families and friends visiting patients at the hospital who will be forced to compete for parking spaces at the hospital with the tenants of the residential tower, further exacerbating an untenable situation
e. the families and friends visiting graves at the cemetery who will be displaced from parking spaces along Paul Sweet Road by residents of the residential tower

Exhibit N

f. first responders who will have to navigate Paul Sweet Road narrowed by on-street parking, whether such parking is allowed or prohibited.
g. the county taxpayer bears the financial burden as the county staff responds to countless complaints, enforces parking regulations, and mitigates the physical consequences of adapting to the inadequate on-site parking.

This shifting of costs responsibility is egregious on its face and is contrary to the Density Bonus legislation's intent to substitute regulatory incentives "rather than additional public subsidy." The costs to the neighbors and the county are simply a different form of subsidy.

Put another way, the shifting of responsibility and costs from the applicant to other parties directly benefits the applicant's financial bottom line to the detriment of the neighbors and county taxpayers.

The Public Safety Consequences of Shifting Responsibility for Providing Parking are Substantial

That shifting of costs is not limited to just the provision of parking. That shift includes the costs of mitigating the risks of serious injury or death arising from impeding first responder access to the residential tower and residents living in neighboring properties. Paul Sweet Road (henceforth "PSR") already has a sign announcing no truck turnarounds. (see No Truck Turnaround PSR" photo, attached) Insufficient parking on-site will logically and inevitably result in an overwhelming demand for off-site parking, with limited ability to accommodate a demand that may be equal to at least 79 vehicles. This figure represents the difference between the county code requirements and the mere 68 on-site parking spaces the applicant *may* provide, accompanied by a request for a 100% waiver to zero (0) spaces. (see Sheet GP0.01 of Applicant's submittal)

This shift of risks and financial costs away from the applicant towards neighbors and the county taxpayer is another element of public safety to be considered: who pays for the consequences of approving a project with insufficient parking, high fire safety risks to adjacent properties, and inadequate fire safety provisions? The immediate and most profound practical affect is to the nearby vulnerable community of 216 elderly residents of Dominican Oaks as described in detail in other emails to you. The additional logical conveyance of risks is outlined above and in the earlier email on the same topic of parking.

That shift also includes shifting the risks associated with insufficient on-site parking. For example:

h. The turning radius along Paul Sweet Road is not consistent with the objective standards of the Central Fire District for firetrucks responding to a fire at the proposed residential tower given the complete absence of on-site access to the tower property. See, for example, the sign on PSR about no truck turnarounds. Will additional parking along PSR, legal or otherwise, for the residents living in the proposed 105-unit tower somehow convert a public safety prohibition into an accommodation? If so, how? The applicant and the county must explain how public safety in all regards is to be maintained along PSR if the proposed residential tower is approved with insufficient on-site parking.
i. The turning radius along Paul Sweet Road is also consistent with the objective standards of the Central Fire District for firetrucks responding to a fire at the proposed residential tower with off-site parking on one or both sides of Paul Sweet Road, whether such parking is

Exhibit N

allowed or prohibited. The same question presented immediately above requires a satisfactory answer.

As noted in an earlier email, if the proposed residential tower is approved with insufficient on-site parking, and in the absence of proximity to a qualified HQTS, the residents in the tower will look for parking spaces within walking distance of their apartments. If the cars associated with the residents of the tower are towed from the Dominican Oaks parking lot and the hospital parking lot, even if parking is allowed on both sides of a widened PSR, such parking will likely present an unacceptable impediment to access by emergency vehicle and first responders to the residential tower, the Dominican Oaks retirement community, Chaminade, and other properties and residents proximate to the north along PSR. This presents a public safety issue inconsistent with the policies and standards expressed in the Public Safety Element of the General Plan, the county code, the operational policies and regulations of the Central Fire District, and the state fire code.

The administrator of the Oakwood Memorial Park across PSR from the proposed residential tower expresses similar concerns:

> "Certainly, Paul Sweet Rd. could not handle that many new residents/cars. It's already a nightmare at the intersection, particularly in the afternoon. Just last week while I was stuck in traffic there, I saw an ambulance, lights, and sirens, trying to get to the hospital, between the huge backup and inconsiderate drivers they were having great difficulty at the stop light, enough of a delay that could have been very detrimental to the patient."
>
> "For the cemetery we're concerned that we'll become a parking lot and recreational area for residents of the project. Both of which would destroy the quiet, contemplative nature of this 117-year-old cemetery." (see email from Randy Krassow, Funeral Director, dated December 8, 2025, attached)

The Emergency Management Coordinator for Dominican Hospital expresses a public safety concern in direct terms:

> "Dominican Hospital is our community's indispensable lifeline, a stable and unwavering resource as our population ages and the unserved population expands, placing unprecedented demands on our services. While other healthcare facilities recede under pressure, Dominican continues to stand firm."
>
> "However, the very bedrock of our operations – unimpeded access for patients and ambulances – is already catastrophically compromised. The current state of traffic flow and limited parking presents a daily threat. We routinely observe vehicles using Paul Sweet and Dominican Way as a dangerous shortcut through our parking lot, directly imperiling landing air ambulances and medical staff transporting patients. Compounding this chaos, emergency vehicles are frequently forced to block critical access points due to pervasive, improper parking."
>
> "To introduce *any* planned development that further cripples our already beleaguered traffic and parking infrastructure would have potentially catastrophic consequences for patient care. This project would dismantle the fragile operational balance we maintain, directly putting lives at risk and undermining our ability to serve effectively in our most

Exhibit N

critical moments. It would severely hamper our ability to manage daily emergencies, and, more critically, could render us incapable of safely evacuating our most vulnerable patients or receiving vital aid during a community-wide disaster." (email from Paul Angelo, Emergency Management Coordinator, dated December 1, 2025, attached)

The Proposed Residential Tower is Not within One-half (½) Mile Proximity to a High-Quality Transit Corridor

As noted in an earlier email, the proposed residential tower is not located within one-half mile of a high-quality transit corridor:

> "Current transit service in the county does not meet the definition of high-quality transit service per the California Public Resources Code (PRC) section 21155, nor does the county have any existing major transit stops as defined in PRC section 21064.3." (see "SCC Sustainability Update, Draft EIR, April 2022, p. 4.15-5)

As noted in PRC 21155, a HQTC requires 15-minute headways. The published Santa Cruz Metro Bus Rider's Guides dated September 2025 and December 2025 clearly and consistently reflect 20-minute headways at the transit stop closest to the proposed tower. (see "SC Metro Headways" schedules, attached) The applicant cannot rely on the assertion of proximity to a HQTS as justification for providing zero or markedly insufficient parking at their proposed tower.

CEQA Compliance is Required

The Builder's Remedy expressly contemplates compliance with CEQA:

> "Nothing in this section supersedes, limits, or otherwise modifies the requirements of, or the standards of review pursuant to, Division 13 (commencing with Section 2100) of the Public Resources Code." (CEQA) (Government Code Section 65905.5 (Builders Remedy))

Where is the Initial Study (CEQA Guidelines Appendix G) that provides the public with the benefit of the county's thinking about potential impacts arising from the proposed residential tower? We have repeatedly asked for the Initial Study and to date have not received it. We must be able to make our own assessment about whether the issues presented in this and earlier emails related to traffic, air quality impacts to sensitive receptors, noise impacts to sensitive receptors, public services, and emergency access, among others, have been adequately addressed.

Conclusion: Deny the Project

For all the compelling reasons and objective policies and standards related to public health and public safety cited above and in earlier emails, we urge you to deny the project. In the event you lean towards approval, we urge you to condition approval on the satisfaction of <u>all</u> public health and public safety issues before issuance of any earth moving or building permits. Public safety is of paramount priority, especially given the proximity of the proposed tower to the elderly residents of Dominican Oaks and patients at Dominican Hospital, the heart and stroke healthcare center for the entire county.

An approval without conditions has significant and unavoidable consequences to the vulnerable elderly residents of the adjacent Dominican Oaks community; the patients, visitors, and staff at

Exhibit N

Dominican Hospital; anyone travelling by any means along Paul Sweet Road, and particularly to fire fighters and other first responders; and the county taxpayers.

Roy E. Brewer
Master of Laws (LLM) in Dispute Resolution

BREWER LOFGREN LLP
ATTORNEYS AT LAW

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916.425.4477 Mobile www.brewerlofgren.com

Exhibit N

Jonathan DiSalvo

From:	Roy Brewer <rbrewer@brewerlofgren.com>
Sent:	Wednesday, December 31, 2025 2:26 PM
To:	Jane Barr (alternate); Jenni Gomez (alternate); Jesse Nickell; Kami Bachir (alternate); Luke Rizzutto, Jr. (alternate); Renee Sheperd; Sandy Brown; Shane Pavonetti; Trina Barton; Yesenia Jimenez (vice chair)
Cc:	Jonathan DiSalvo; Natalie Kirkish; Donovan Arteaga
Subject:	Opposition to 3500 Paul Sweet Road - Parking Part 2
Attachments:	No Truck Turnaround PSR 20 Dec 25.pdf; Randy Krassow Email 08 Dec 25.docx; Paul Angelo Email 01 Dec 25.docx; SC Metro Headways 11 Sep and 18 Dec 25.pdf

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

As you recall from earlier emails, this firm represents Dominican Hospital, the undisputed primary heart and stroke healthcare center for the county, and the Dominican Oaks retirement community, and 206-unit community with 216 vulnerable, sensitive receptor residents having an average age of 88. We write again today to reiterate opposition to the proposed 105-unit residential tower at 3500 Paul Sweet Road. This email is the second of two emails addressing the public safety issues arising from insufficient on-site parking being proposed by the applicant.

The Applicant's Attempt to Shift the Responsibility and Costs for Parking to Others is Unacceptable

Nowhere in the legislation is it written that the applicant can unilaterally and arbitrarily dictate or limit the terms of the conversation with the county. Nowhere is it written that an applicant can claim financial infeasibility or hardship related to proposed condition of approval without providing substantial, verifiable evidence to support that claim. See the citations provided in the earlier email to "reasonable documentation" and "identifiable and actual cost reductions." The absence of such evidence exposes the claims as expressions of unsubstantiated opinion and the applicant's preference and cannot be relied upon as part of your decision-making process.

The applicant's insistence on an undocumented financial burden is a transparent attempt to shift the financial cost of providing adequate parking, based on the decades of experience resulting in the requirements of the county code, from the applicant to:

a. neighboring properties, including the vulnerable elderly residents of Dominican Oaks
b. the families of residents living at Dominican Oaks
c. the staff at Dominican Hospital, who will be forced to compete for parking spaces with the tenants of the residential tower, exacerbating an already stressed parking infrastructure
d. the families and friends visiting patients at the hospital who will be forced to compete for parking spaces at the hospital with the tenants of the residential tower, further exacerbating an untenable situation
e. the families and friends visiting graves at the cemetery who will be displaced from parking spaces along Paul Sweet Road by residents of the residential tower

Exhibit N

f. first responders who will have to navigate Paul Sweet Road narrowed by on-street parking, whether such parking is allowed or prohibited.
g. the county taxpayer bears the financial burden as the county staff responds to countless complaints, enforces parking regulations, and mitigates the physical consequences of adapting to the inadequate on-site parking.

This shifting of costs responsibility is egregious on its face and is contrary to the Density Bonus legislation's intent to substitute regulatory incentives "rather than additional public subsidy." The costs to the neighbors and the county are simply a different form of subsidy.

Put another way, the shifting of responsibility and costs from the applicant to other parties directly benefits the applicant's financial bottom line to the detriment of the neighbors and county taxpayers.

The Public Safety Consequences of Shifting Responsibility for Providing Parking are Substantial

That shifting of costs is not limited to just the provision of parking. That shift includes the costs of mitigating the risks of serious injury or death arising from impeding first responder access to the residential tower and residents living in neighboring properties. Paul Sweet Road (henceforth "PSR") already has a sign announcing no truck turnarounds. (see No Truck Turnaround PSR" photo, attached) Insufficient parking on-site will logically and inevitably result in an overwhelming demand for off-site parking, with limited ability to accommodate a demand that may be equal to at least 79 vehicles. This figure represents the difference between the county code requirements and the mere 68 on-site parking spaces the applicant *may* provide, accompanied by a request for a 100% waiver to zero (0) spaces. (see Sheet GP0.01 of Applicant's submittal)

This shift of risks and financial costs away from the applicant towards neighbors and the county taxpayer is another element of public safety to be considered: who pays for the consequences of approving a project with insufficient parking, high fire safety risks to adjacent properties, and inadequate fire safety provisions? The immediate and most profound practical affect is to the nearby vulnerable community of 216 elderly residents of Dominican Oaks as described in detail in other emails to you. The additional logical conveyance of risks is outlined above and in the earlier email on the same topic of parking.

That shift also includes shifting the risks associated with insufficient on-site parking. For example:

h. The turning radius along Paul Sweet Road is not consistent with the objective standards of the Central Fire District for firetrucks responding to a fire at the proposed residential tower given the complete absence of on-site access to the tower property. See, for example, the sign on PSR about no truck turnarounds. Will additional parking along PSR, legal or otherwise, for the residents living in the proposed 105-unit tower somehow convert a public safety prohibition into an accommodation? If so, how? The applicant and the county must explain how public safety in all regards is to be maintained along PSR if the proposed residential tower is approved with insufficient on-site parking.
i. The turning radius along Paul Sweet Road is also consistent with the objective standards of the Central Fire District for firetrucks responding to a fire at the proposed residential tower with off-site parking on one or both sides of Paul Sweet Road, whether such parking is

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allowed or prohibited. The same question presented immediately above requires a satisfactory answer.

As noted in an earlier email, if the proposed residential tower is approved with insufficient on-site parking, and in the absence of proximity to a qualified HQTS, the residents in the tower will look for parking spaces within walking distance of their apartments. If the cars associated with the residents of the tower are towed from the Dominican Oaks parking lot and the hospital parking lot, even if parking is allowed on both sides of a widened PSR, such parking will likely present an unacceptable impediment to access by emergency vehicle and first responders to the residential tower, the Dominican Oaks retirement community, Chaminade, and other properties and residents proximate to the north along PSR. This presents a public safety issue inconsistent with the policies and standards expressed in the Public Safety Element of the General Plan, the county code, the operational policies and regulations of the Central Fire District, and the state fire code.

The administrator of the Oakwood Memorial Park across PSR from the proposed residential tower expresses similar concerns:

> "Certainly, Paul Sweet Rd. could not handle that many new residents/cars. It's already a nightmare at the intersection, particularly in the afternoon. Just last week while I was stuck in traffic there, I saw an ambulance, lights, and sirens, trying to get to the hospital, between the huge backup and inconsiderate drivers they were having great difficulty at the stop light, enough of a delay that could have been very detrimental to the patient."
>
> "For the cemetery we're concerned that we'll become a parking lot and recreational area for residents of the project. Both of which would destroy the quiet, contemplative nature of this 117-year-old cemetery." (see email from Randy Krassow, Funeral Director, dated December 8, 2025, attached)

The Emergency Management Coordinator for Dominican Hospital expresses a public safety concern in direct terms:

> "Dominican Hospital is our community's indispensable lifeline, a stable and unwavering resource as our population ages and the unserved population expands, placing unprecedented demands on our services. While other healthcare facilities recede under pressure, Dominican continues to stand firm."
>
> "However, the very bedrock of our operations – unimpeded access for patients and ambulances – is already catastrophically compromised. The current state of traffic flow and limited parking presents a daily threat. We routinely observe vehicles using Paul Sweet and Dominican Way as a dangerous shortcut through our parking lot, directly imperiling landing air ambulances and medical staff transporting patients. Compounding this chaos, emergency vehicles are frequently forced to block critical access points due to pervasive, improper parking."
>
> "To introduce *any* planned development that further cripples our already beleaguered traffic and parking infrastructure would have potentially catastrophic consequences for patient care. This project would dismantle the fragile operational balance we maintain, directly putting lives at risk and undermining our ability to serve effectively in our most

Exhibit N

critical moments. It would severely hamper our ability to manage daily emergencies, and, more critically, could render us incapable of safely evacuating our most vulnerable patients or receiving vital aid during a community-wide disaster." (email from Paul Angelo, Emergency Management Coordinator, dated December 1, 2025, attached)

The Proposed Residential Tower is Not within One-half (½) Mile Proximity to a High-Quality Transit Corridor

As noted in an earlier email, the proposed residential tower is not located within one-half mile of a high-quality transit corridor:

> "Current transit service in the county does not meet the definition of high-quality transit service per the California Public Resources Code (PRC) section 21155, nor does the county have any existing major transit stops as defined in PRC section 21064.3." (see "SCC Sustainability Update, Draft EIR, April 2022, p. 4.15-5)

As noted in PRC 21155, a HQTC requires 15-minute headways. The published Santa Cruz Metro Bus Rider's Guides dated September 2025 and December 2025 clearly and consistently reflect 20-minute headways at the transit stop closest to the proposed tower. (see "SC Metro Headways" schedules, attached) The applicant cannot rely on the assertion of proximity to a HQTS as justification for providing zero or markedly insufficient parking at their proposed tower.

CEQA Compliance is Required

The Builder's Remedy expressly contemplates compliance with CEQA:

> "Nothing in this section supersedes, limits, or otherwise modifies the requirements of, or the standards of review pursuant to, Division 13 (commencing with Section 2100) of the Public Resources Code." (CEQA) (Government Code Section 65905.5 (Builders Remedy))

Where is the Initial Study (CEQA Guidelines Appendix G) that provides the public with the benefit of the county's thinking about potential impacts arising from the proposed residential tower? We have repeatedly asked for the Initial Study and to date have not received it. We must be able to make our own assessment about whether the issues presented in this and earlier emails related to traffic, air quality impacts to sensitive receptors, noise impacts to sensitive receptors, public services, and emergency access, among others, have been adequately addressed.

Conclusion: Deny the Project

For all the compelling reasons and objective policies and standards related to public health and public safety cited above and in earlier emails, we urge you to deny the project. In the event you lean towards approval, we urge you to condition approval on the satisfaction of <u>all</u> public health and public safety issues before issuance of any earth moving or building permits. Public safety is of paramount priority, especially given the proximity of the proposed tower to the elderly residents of Dominican Oaks and patients at Dominican Hospital, the heart and stroke healthcare center for the entire county.

An approval without conditions has significant and unavoidable consequences to the vulnerable elderly residents of the adjacent Dominican Oaks community; the patients, visitors, and staff at

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Dominican Hospital; anyone travelling by any means along Paul Sweet Road, and particularly to fire fighters and other first responders; and the county taxpayers.

Roy E. Brewer
Master of Laws (LLM) in Dispute Resolution

BREWER LOFGREN LLP
ATTORNEYS AT LAW

Carmichael & Folsom California
916.425.4477 Mobile www.brewerlofgren.com

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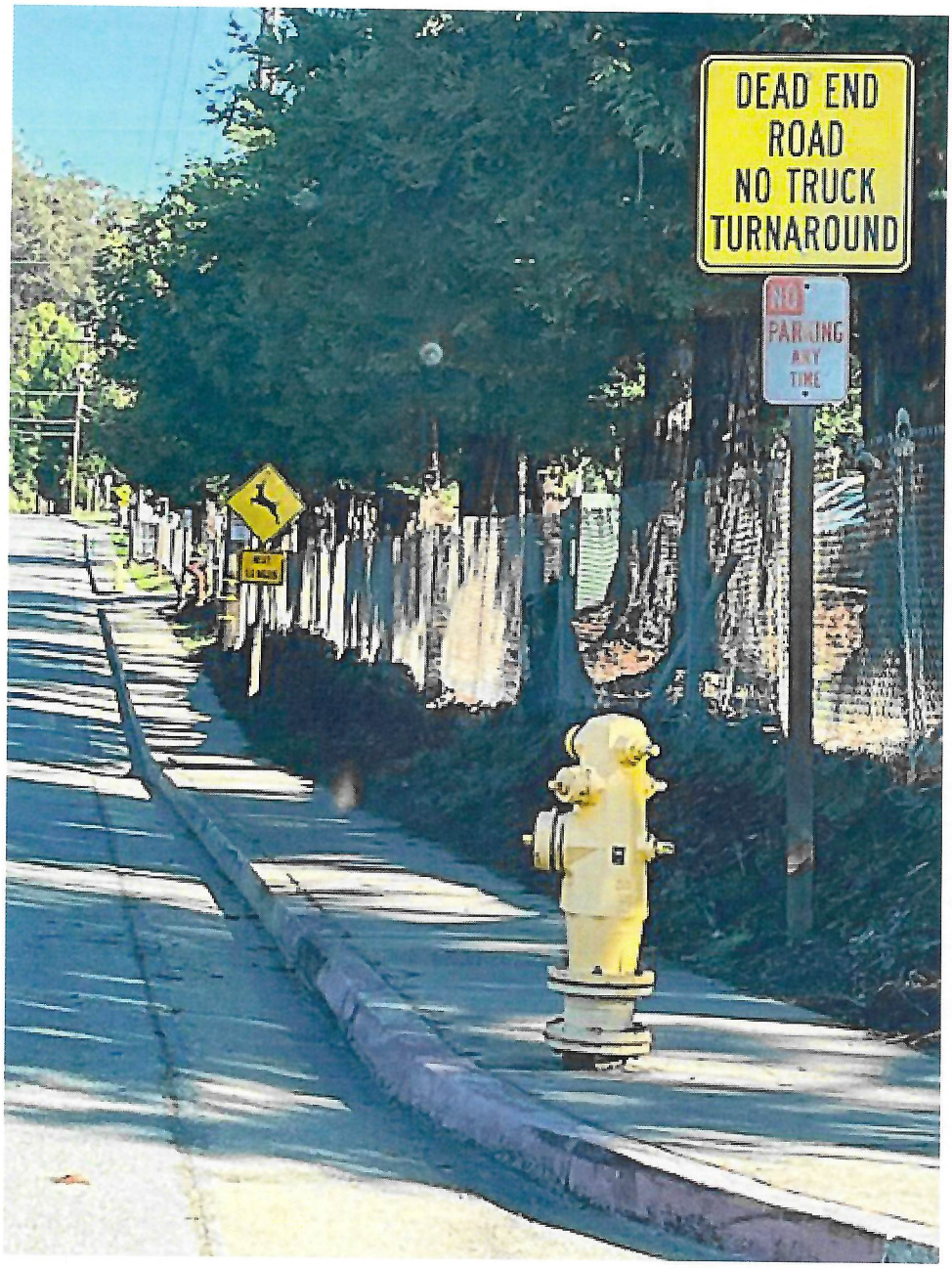

Exhibit N

From: **Paul Angelo CA-SANTA CRUZ** <paul.angelo@commonspirit.org>
Date: Mon, Dec 1, 2025 at 3:38 PM
To: Rachel Howley CA-Santa Cruz <rachel.howley@commonspirit.org>

Dominican Hospital is our community's indispensable lifeline, a stable and unwavering resource as our population ages and the unserved population expands, placing unprecedented demands on our services. While other healthcare facilities recede under pressure, Dominican continues to stand firm.

However, the very bedrock of our operations – unimpeded access for patients and ambulances – is already catastrophically compromised. The current state of traffic flow and limited parking presents a daily threat. We routinely observe vehicles using Paul Sweet and Dominican Way as a dangerous shortcut through our parking lot, directly imperiling landing air ambulances and medical staff transporting patients. Compounding this chaos, emergency vehicles are frequently forced to block critical access points due to pervasive, improper parking.

Our institution has faced monumental challenges. We have borne the brunt of multiple disasters, witnessing extreme surges in patient demand. During the 2020 CZU wildfires, we were forced to engage in urgent and comprehensive contingency planning for the possible evacuation of both the hospital and Dominican Oaks, an unthinkable scenario during the pandemic prompted by the fire jumping the freeway.

To introduce *any* planned development that further cripples our already beleaguered traffic and parking infrastructure would have potentially catastrophic consequences for patient care. This project would dismantle the fragile operational balance we maintain, directly putting lives at risk and undermining our ability to serve effectively in our most critical moments. It would severely hamper our ability to manage daily emergencies, and, more critically, could render us incapable of safely evacuating our most vulnerable patients or receiving vital aid during a community-wide disaster.

We urge you to reject any proposal that would recklessly imperil the health and safety of our community."

Thank You

Paul Angelo BSN, RN, EMT-P, CEN

Prehospital Liaison / Emergency Management Coordinator

Dominican Hospital Santa Cruz

Exhibit N

From: **Randy Krassow** <Randy@scmemorial.com>
Date: Mon, Dec 8, 2025 at 11:44 AM
Subject: RE: Planning hearing for 3500 development
To: Rachel Howley CA-Santa Cruz <rachel.howley@commonspirit.org>
CC: Chris Krassow <Chris@scmemorial.com>

Certainly, Paul Sweet Rd. could not handle that many new residents/cars. It's already a nightmare at the intersection, particularly in the afternoon. Just last week while I was stuck in traffic there, I saw an ambulance, lights, and sirens, trying to get to the hospital, between the huge backup and inconsiderate drivers they were having great difficulty at the stop light, enough of a delay that could have been very detrimental to the patient.

For the cemetery we're concerned that we'll become a parking lot and recreational area for residents of the project. Both of which would destroy the quiet, contemplative nature of this 117-year-old cemetery.

Randy Krassow, Funeral Director (FDR-340)

Santa Cruz Memorial- Oakwood Memorial- Garden of Memories

1927 Ocean Street, Santa Cruz, CA 95060

Exhibit N

HEADWAYS

BUS RIDER'S GUIDE • Fall 2025 • Effective September 11, 2025

SANTA CRUZ METRO

Harvesting Connections: METRO's Fall Edition

- Inside METRO: The People Behind the Transit p.1
- Fall Highlighted Service Changes p.2

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ROUTE 1 WEEKDAY - OUTBOUND

1 Soquel/Cabrillo/Airport to Watsonville

Departs	Departs	Departs	Departs	Arrives
RiverFront Area 1	Soquel Dr (Dominican Hospital)	Cabrillo College	Airport Blvd (Freedom Centre)	Watsonville Transit Center
A	B	C	D	E
MONDAY - FRIDAY				
5:40AM	5:50	6:00	6:17	6:35
6:00	6:10	6:20	6:37	6:55
6:20	6:30	6:40	6:57	7:15
6:40	6:50	7:00	7:17	7:35
7:00	7:10	7:20	7:37	7:55
7:20	7:30	7:40	7:57	8:15
7:40	7:52	8:03	8:20	8:38
8:00	8:13	8:24	8:41	8:59
8:20	8:33	8:44	9:01	9:19
8:40	8:53	9:05	9:22	9:40
9:00	9:13	9:26	9:43	10:01
9:20	9:33	9:46	10:03	10:21
9:40	9:53	10:06	10:23	10:41
10:00	10:16	10:29	10:46	11:04
10:20	10:36	10:49	11:06	11:24
10:40	10:56	11:09	11:26	11:44
11:00	11:18	11:31	11:48	12:07PM
11:20	11:38	11:51	12:09	12:28
11:40	11:58	12:11	12:29	12:49
12:00	12:18	12:31	12:49	1:09
12:20	12:38	12:51	1:09	1:29
12:40	12:59	1:12	1:30	1:50
1:00	1:19	1:32	1:50	2:10
1:20	1:39	1:52	2:10	2:30
1:40	1:59	2:13	2:31	2:51
2:00	2:19	2:33	2:51	3:11
2:20	2:39	2:53	3:13	3:34
2:40	2:59	3:16	3:36	3:57
3:00	3:19	3:38	3:58	4:20
3:20	3:39	3:58	4:19	4:41
3:40	3:59	4:19	4:40	5:02
4:00	4:19	4:40	5:01	5:23
4:20	4:39	5:00	5:22	5:44
4:40	4:57	5:18	5:41	6:03
5:00	5:17	5:38	6:01	6:23
5:20	5:35	5:56	6:19	6:40
5:40	5:55	6:08	6:28	6:49
6:00	6:13	6:26	6:46	7:05
6:20	6:32	6:45	7:02	7:21
6:40	6:52	7:04	7:21	7:40
7:00	7:11	7:23	7:40	7:58

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1 Soquel/Cabrillo/Airport to Watsonville

Departs	Departs	Departs	Departs	Arrives
RiverFront Area 1	Soquel Dr (Dominican Hospital)	Cabrillo College	Airport Blvd (Freedom Centre)	Watsonville Transit Center
A	B	C	D	E
MONDAY - FRIDAY				
7:20	7:31	7:43	8:00	8:18
7:40	7:51	8:03	8:20	8:38
8:00	8:11	8:23	8:40	8:58
8:20	8:31	8:43	9:00	9:18
8:40	8:51	9:03	9:20	9:38
9:00	9:11	9:21	9:38	9:55
10:00	10:11	10:20	10:37	10:54
11:00	11:09	11:18	11:35	11:52
12:00	12:09	12:18	12:35	12:52

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ROUTE 1 WEEKDAY - INBOUND

1 Soquel/Cabrillo/Airport to Santa Cruz

Departs	Departs	Departs	Departs	Arrives
Watsonville TC Lane 3	Airport Blvd (Freedom Centre)	Cabrillo College	Soquel Dr (Dominican Hospital)	RiverFront Area 2
E	D	C	B	A
MONDAY - FRIDAY				
5:10 AM	5:25	5:44	5:53	6:08
5:40	5:55	6:14	6:23	6:38
6:00	6:15	6:34	6:43	6:58
6:20	6:35	6:59	7:09	7:24
6:40	6:55	7:19	7:29	7:44
7:00	7:15	7:39	7:51	8:06
7:20	7:38	8:02	8:16	8:31
7:40	7:58	8:22	8:36	8:51
8:00	8:18	8:42	8:57	9:12
8:20	8:39	9:03	9:17	9:32
8:40	8:59	9:23	9:37	9:52
9:00	9:19	9:40	9:54	10:09
9:20	9:39	9:58	10:12	10:27
9:40	9:59	10:18	10:32	10:47
10:00	10:19	10:38	10:52	11:07
10:20	10:39	10:58	11:12	11:27
10:40	10:59	11:18	11:32	11:47
11:00	11:19	11:38	11:52	12:07 PM
11:20	11:40	11:59	12:13	12:29
11:40	12:00	12:19	12:33	12:49
12:00	12:21	12:40	12:54	1:11
12:20	12:41	1:00	1:14	1:31
12:40	1:01	1:20	1:34	1:51
1:00	1:21	1:40	1:54	2:11
1:20	1:41	2:00	2:14	2:31
1:40	2:01	2:20	2:34	2:51
2:00	2:21	2:40	2:54	3:11
2:20	2:41	3:00	3:14	3:31
2:40	3:01	3:20	3:34	3:51
3:00	3:21	3:40	3:54	4:11
3:20	3:41	4:00	4:14	4:31
3:40	4:01	4:20	4:34	4:51
4:00	4:21	4:40	4:54	5:11
4:20	4:41	5:00	5:13	5:30
4:40	5:01	5:20	5:33	5:50
5:00	5:20	5:39	5:52	6:08
5:20	5:40	5:59	6:11	6:26
5:40	6:00	6:19	6:31	6:46
6:00	6:18	6:37	6:48	7:02
6:20	6:38	6:57	7:07	7:20
6:40	6:58	7:17	7:27	7:40

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1 Soquel/Cabrillo/Airport to Santa Cruz

Departs	Departs	Departs	Departs	Arrives
Watsonville TC Lane 3	Airport Blvd (Freedom Centre)	Cabrillo College	Soquel Dr (Dominican Hospital)	RiverFront Area 2
E	D	C	B	A
MONDAY - FRIDAY				
7:00	7:17	7:36	7:46	7:59
7:20	7:37	7:56	8:06	8:19
7:40	7:57	8:16	8:26	8:38
8:00	8:15	8:34	8:44	8:55
8:20	8:35	8:54	9:04	9:15
8:40	8:55	9:14	9:24	9:35
9:00	9:15	9:34	9:43	9:54
9:30	9:45	10:04	10:13	10:24
10:30	10:44	11:03	11:12	11:20
11:30	11:44	12:03	12:12	12:20

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HEADWAYS

BUS RIDER'S GUIDE • Winter 2025 • Effective December 18, 2025

Go Digital, Ride Green!
Headways discontinues in Summer 2026
(more details p.3)

SANTA CRUZ METRO

Your Winter Ride Starts Here: METRO's Winter Edition

- Inside METRO: The People Behind the Transit p.1
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6:20	6:30	6:41	7:00	7:15
6:40	6:50	7:01	7:20	7:35
7:00	7:12	7:25	7:45	8:02
7:20	7:32	7:45	8:05	8:22
7:40	7:52	8:05	8:25	8:42
8:00	8:12	8:25	8:45	9:02
8:20	8:32	8:45	9:05	9:22
8:40	8:54	9:08	9:28	9:45
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9:20	9:34	9:48	10:08	10:25
9:40	9:54	10:08	10:28	10:45
10:00	10:14	10:28	10:48	11:05
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12:00	12:18	12:34	12:55	1:14
12:20	12:38	12:54	1:15	1:34
12:40	12:58	1:14	1:35	1:54
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1:40	1:58	2:14	2:37	2:58
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2:20	2:38	2:54	3:17	3:38
2:40	2:59	3:17	3:41	4:04
3:00	3:19	3:37	4:01	4:24
3:20	3:39	4:01	4:28	4:49
3:40	3:59	4:21	4:48	5:09
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4:40	4:58	5:19	5:44	6:02
5:00	5:18	5:39	6:04	6:22
5:20	5:35	5:56	6:19	6:37
5:40	5:55	6:09	6:31	6:48
6:00	6:13	6:27	6:47	7:04
6:20	6:33	6:47	7:07	7:24
6:40	6:53	7:07	7:27	7:44
7:00	7:11	7:23	7:42	7:57

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8:40	8:51	9:03	9:22	9:37
9:00	9:11	9:23	9:42	9:57
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6:00	6:15	6:35	6:47	6:57
6:20	6:37	7:02	7:14	7:24
6:40	6:57	7:29	7:43	7:56
7:00	7:17	7:59	8:17	8:31
7:20	7:37	8:19	8:37	8:51
7:40	8:01	8:36	8:51	9:04
8:00	8:21	8:56	9:11	9:24
8:20	8:41	9:09	9:22	9:34
8:40	8:59	9:23	9:38	9:50
9:00	9:19	9:43	9:58	10:10
9:20	9:39	10:03	10:18	10:30
9:40	10:00	10:22	10:37	10:50
10:00	10:20	10:42	10:57	11:10
10:20	10:40	11:02	11:17	11:30
10:40	11:00	11:22	11:37	11:50
11:00	11:20	11:42	11:57	12:10PM
11:20	11:40	12:02	12:17	12:30
11:40	12:00	12:22	12:37	12:50
12:00	12:21	12:42	12:57	1:11
12:20	12:41	1:02	1:17	1:31
12:40	1:01	1:22	1:37	1:51
1:00	1:21	1:42	1:57	2:11
1:20	1:40	2:01	2:15	2:28
1:40	2:02	2:24	2:40	2:56
2:00	2:22	2:44	3:00	3:16
2:20	2:42	3:04	3:20	3:36
2:40	3:01	3:22	3:37	3:51
3:00	3:21	3:42	3:57	4:11
3:20	3:41	4:02	4:17	4:31
3:40	4:01	4:22	4:37	4:51
4:00	4:26	4:47	5:02	5:16
4:20	4:40	5:01	5:15	5:29
4:40	5:00	5:21	5:35	5:49
5:00	5:20	5:41	5:55	6:09
5:20	5:40	6:01	6:15	6:29
5:40	6:00	6:21	6:35	6:49
6:00	6:18	6:37	6:49	7:01
6:20	6:38	6:57	7:09	7:21
6:40	6:58	7:17	7:29	7:41

Transfers to MST may be available on this route - visit our website Transfer Policy Page

Las transferencias hacia MST pueden estar disponibles en esta ruta – visite nuestra Página de Póliza de Transferencias

more trips continued / *más viajes* →

1 Soquel/Cabrillo/Airport to Santa Cruz

Departs	Departs	Departs	Departs	Arrives
Watsonville TC Lane 3	Airport Blvd (Freedom Centre)	Cabrillo College	Soquel Dr (Dominican Hospital)	RiverFront Area 2
E	D	C	B	A
MONDAY - FRIDAY				
7:00	7:18	7:37	7:49	8:01
7:20	7:37	7:57	8:08	8:19
7:40	7:57	8:17	8:28	8:39
8:00	8:17	8:37	8:48	8:59
8:20	8:34	8:54	9:05	9:15
8:40	8:54	9:14	9:25	9:35
9:00	9:14	9:34	9:45	9:55
9:30	9:44	10:04	10:15	10:25
10:30	10:44	11:04	11:15	11:25
11:30	11:44	12:04	12:15	12:25

Transfers to MST may be available on this route - visit our website Transfer Policy Page

Las transferencias hacia MST pueden estar disponibles en esta ruta – visite nuestra Página de Póliza de Transferencias

BOGARD CONSTRUCTION, INC.
Since 1947

December 4, 2025
Dominican Oaks Adjacent Property Development

Dear Rachel,

We have reviewed the design development drawings for the proposed residential project at 3500 Paul Sweet Road (APN 02501337), with particular attention to life-safety concerns affecting both Dominican Hospital and Dominican Oaks. Based on the drawings, I have identified several significant issues with the project as currently proposed.

1. Emergency Access and Egress Concerns: The proposed locations for fire-apparatus staging, both positioned on Dominican Oaks property, would completely block the private driveway serving the facility. In an emergency—particularly a fire originating in the adjacent new building—this blockage would prevent or severely impede the evacuation of Dominican Oaks residents, who require dependable, unobstructed egress because of their age and mobility needs.

2. Proposed Use of the Dominican Oaks Private Fire Hydrant: The drawings appear to indicate that the developer intends to rely on the Dominican Oaks private fire hydrant during fire department operations. This hydrant is supplied by a private fire water system supported by a booster pump, which was designed specifically for Dominican Oaks. Additional engineering analysis is necessary to determine:

- Whether simultaneous use by the proposed development could compromise fire flow availability for Dominican Oaks, and
- Whether the water system can safely accommodate external demand without affecting its primary function.

Until this analysis is completed, the proposed hydrant use presents an unresolved and potentially serious risk.

3. Exterior Fire Exposure Due to Extremely Close Proximity: The proposed 82-foot-tall, 106-unit building is planned at approximately five feet from the Dominican Oaks property line. For a building of this height and density, such minimal spacing creates a meaningful exterior fire-exposure risk. A fire in the new building could expose Dominican Oaks to:

- High levels of radiant heat,
- Wind-carried burning debris, and
- Increased complexity in evacuating a vulnerable population.

Best practices in the fire-protection field generally recommend substantially greater separation distances between multi-story structures, or—where distance is not feasible—the incorporation of enhanced fire-rated construction and protection features. Further evaluation by qualified fire-protection engineers is strongly recommended, particularly with a building of this magnitude.

4. A Building Mass Out of Scale With the Neighborhood Context: Beyond the measurable life-safety concerns, the proposed structure is significantly out of scale with the surrounding neighborhood. The Paul Sweet Road corridor is characterized by low-rise, low-density buildings that serve healthcare facilities, residents, and senior-living communities in a quiet and intentionally moderated environment. In contrast, the proposed tower—on a very constrained quarter-acre parcel—introduces a building mass and height that are disproportionate and inconsistent with the character of the area. This is not merely an aesthetic issue; the outsized scale directly contributes to intensified fire-exposure risk, evacuation challenges, and emergency-response complications for Dominican Oaks.

5. Reliance on Dominican Oaks' Property and Infrastructure: The current proposal depends on Dominican Oaks property for fire-truck staging and fire-protection water supply—neither of which Dominican Oaks is obligated to support. Senior-living facilities must preserve independence in their emergency-response planning, and the current design places an undue operational burden on Dominican Oaks.

6. Additional Considerations: Other aspects - including potential traffic impacts, environmental review requirements, and infrastructure constraints - will likely require further evaluation by the appropriate specialists.

To be clear, this assessment does not oppose a development of some kind. A well-designed project could benefit the community and, if properly planned, coexist successfully with Dominican Hospital and Dominican Oaks.

However, as currently proposed, the project presents significant life-safety concerns, relies improperly on Dominican Oaks infrastructure, and is not compatible with the existing neighborhood scale or with the operational needs of a senior-housing facility.

A mutually beneficial outcome is achievable, but only if the development team is willing to revise the project to comply fully with applicable fire and building code requirements, ensure unobstructed emergency egress for Dominican Oaks, operate independently of Dominican Oaks' private fire-protection systems, and reduce the exposure risks associated with building height and minimal setbacks. I would be glad to continue the discussion or assist in evaluating revised proposals that better protect Dominican Hospital and Dominican Oaks while still enabling responsible use of the site.

Sincerely,

Chip Bogaard
Bogard Construction, Inc.

Kristen Brown, Executive Director
Santa Cruz Area Chamber of Commerce

Dan Smart, Board Co-Chair
La Bahia

Stephanie Munoz, Board Co-Chair
BTF Enterprises

Bonnie Lipscomb
City of Santa Cruz

Rick Weiss
Bay Federal Credit Union

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The Glass Jar

Nicole Coburn
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Melissa Whatley
UC Santa Cruz

Yvette Brooks
United Way Santa Cruz County

James Abbott
Abbott SPI

Shawn Adams
Santa Cruz Signs

Omid Aminifard
Santa Cruz Seaside Company

Stephanie Connor Kent, RN, MN
Sutter Maternity & Surgery Center

Jennifer Cosby
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Kristin Fabos
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Kieran Kelly
Kaiser Permanente

Morgan Lyng Lukina
David Lyng Real Estate

Chris Murphy
Golden State Warriors/Santa Cruz Warriors

Anthony Pagliaro
Dominican Hospital Foundation

Christian Pellecchia
JE Dunn Construction

Sean Woodruff
Hyatt Place

Matthew James
Spencer Fane

Duf Fischer
Santa Cruz Chamber Ambassadors

(831) 457-3713
SANTACRUZCHAMBER.ORG

September 19, 2025

Santa Cruz County Planning Commission
701 Ocean Street
Santa Cruz, CA 95060

Re: Support for Workbench Housing Development at 3500 Paul Sweet Road

Dear Commissioners,

On behalf of the Santa Cruz Area Chamber of Commerce, I am writing to express our support for the proposed multifamily housing development at 3500 Paul Sweet Road.

As our region continues to face an unprecedented housing shortage, projects that add well-planned and attainable homes, particularly in proximity to major employers, are essential for the long-term economic and social health of Santa Cruz County. Workbench's proposal represents the type of smart, infill-oriented housing investment our community needs.

The project includes 105 new homes in a six-story building with a total of 91,917 square feet. The unit mix includes 30 studios, 55 junior one-bedroom units, 5 one-bedroom units, and 15 two-bedroom units. This range of housing types provides options suitable for the modern local workforce, seniors, and individuals seeking smaller and more attainable units.

The development also delivers six Extremely Low-Income units, which contributes to the county's affordable housing goals and helps ensure that vulnerable residents have access to stable and secure housing. The inclusion of a first right of refusal for employees of The Chaminade Resort further emphasizes the

Exhibit N

Kristen Brown, Executive Director
Santa Cruz Area Chamber of Commerce

Dan Smart, Board Co-Chair
La Bahia

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Matthew James
Spencer Fane

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Santa Cruz Chamber Ambassadors

project's commitment to creating workforce housing opportunities close to jobs.

The proposal incorporates transportation and sustainability features, including 68 parking spaces with EV charging, 127 Class I bicycle spaces, 26 Class II bicycle spaces, and on-site amenities such as an outdoor terrace and lounge area. These features support multimodal transportation and reduce reliance on single-occupancy vehicles.

As employers across the county continue to cite housing costs and shortages as barriers to recruitment and retention, the Chamber believes it is critical to support projects that expand supply, include affordability, and provide more options for the local workforce. This development aligns with those priorities and will contribute meaningfully to meeting the county's housing needs.

For these reasons, we respectfully urge the Planning Commission to support the project at 3500 Paul Sweet Road.

Thank you for your consideration and for your ongoing commitment to addressing our community's housing challenges.

Sincerely,

Kristen Brown
Executive Director
Santa Cruz Area Chamber of Commerce

kbrown@santacruzchamber.org
(831) 435-0806

Exhibit N

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September 19, 2025

Santa Cruz County Planning Commission
701 Ocean Street
Santa Cruz, CA 95060

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As employers across the county continue to cite housing costs and shortages as barriers to recruitment and retention, the Chamber believes it is critical to support projects that expand supply, include affordability, and provide more options for the local workforce. This development aligns with those priorities and will contribute meaningfully to meeting the county's housing needs.

For these reasons, we respectfully urge the Planning Commission to support the project at 3500 Paul Sweet Road.

Thank you for your consideration and for your ongoing commitment to addressing our community's housing challenges.

Sincerely,

Kristen Brown
Executive Director
Santa Cruz Area Chamber of Commerce

kbrown@santacruzchamber.org
(831) 435-0806

Exhibit N

Jonathan DiSalvo

From: judy warner <warnerjudy100@gmail.com>
Sent: Thursday, December 18, 2025 10:11 AM
To: Jonathan DiSalvo
Cc: Donovan Arteaga
Subject: PLANNING COMMISSION MEETING FOR 3500 PAUL SWEET ROAD

****CAUTION:**This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Members of the Planning Commission, we share a problem with you--we're sandwiched between a Housing Element and Builder's Remedy. What started out as the means to a good end has taken us away from local knowledge, wisdom, and the reality check for decision making.

Where I am, the Dominican Oaks Senior Community, there are many of us independent-living residents with one or more disabilities that affect eyesight, hearing, breathing, or the ability to make quick decisions and communicate clearly. Many of us have arthritis or issues of the muscular-skeletal system.

More than a few of us also have mobility made possible only by walkers, wheelchairs, or canes. Assisted-living residents are those who need more care, often around the clock. Whether temporary or permanent, all of us here are protected by the Americans with Disabilities Act. Rights for the disabled are Civil Rights.

During the design process, builders of new-construction housing are expected to make reasonable accommodations for the rights of disabled neighbors. The developer has made none for the senior community next door with respect to access to safety during emergencies and to daily life activities. Accessible

Exhibit N

entrances from Paul Sweet Road and vicinity must always be kept clear and open for evacuations and daily living needs.

Please vote NO on 3500, and begin working with community and colleagues state-wide to end the Builder's Remedy. It's time to take back your power to represent your constituents.

I would appreciate your adding my comments to the County Planning Commission folders for the appropriate meeting.

Judy H. Warner
3400 Paul Sweet Road
Santa Cruz, CA 95065

Exhibit N

Jonathan DiSalvo

From: Virginia Lieb <virginia@lieb.com>
Sent: Friday, October 31, 2025 7:25 AM
To: Jonathan DiSalvo
Cc: Jamie Sehorn
Subject: proposed "Sweet Homes" tenement housing at 3500 Paul Sweet Road.

Follow Up Flag: Follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Hi Mr. DiSalvo,

Jamie Sehorn asked me to send you my following letter about the proposed "Sweet Homes" tenement housing at 3500 Paul Sweet Road. I recently sent this letter to Manu Koenig, the other members of the Santa Cruz County Board of Supervisors and the members of the County of Santa Cruz Planning Commission.

I have assked Donovan Artega to include my letter as part of the public record once the 'Sweet Homes" project is agendized for one of the upcoming Planning Commission Meetings.

Please let me know at which Planning committee meeting the "Sweet Homes" project will be on the agenda,

Thank you for your time and consideration

Virginia W Lieb
3400 Paul Sweet Road, Unit C-213
Santa Cruz, CA 95065
484-678-8301
virginia@lieb.com

Begin forwarded message:

From: Virginia Lieb <virginia@lieb.com>
Subject: Proposed Sweet Homes project is a health and safety hazard and does not conform to federal FAA regulations
Date: October 24, 2025 at 1:06:54 PM PDT

Exhibit N

To: Manu.Koenig@santacruzcountyca.gov
Cc: Second.District@santacruzcountyca.gov, justin.cummings@santacruzcountyca.gov, felipe.hernandez@santacruzcountyca.gov, Fifth.District@santacruzcountyca.gov, s.pavonetti@gmail.com, rizcon@earthlink.net, jessenickell3art@gmail.com, janerbarr@aol.com, Trina.Barton@santacruzcountyca.gov, Sandy.Brown@santacruzcountyca.gov, yeseniajduran@gmail.com, kami@davidlyng.com, renee@reneesgarden.com, jagomez173@gmail.com, Jamie Sehorn <Jamie.Sehorn@santacruzcountyca.gov>

Dear Supervisor Koenig,

3500 PSR poses Health and Safety Hazards:

As a resident of Dominican Oaks, I am deeply concerned about the dangers of the proposed "Sweet Homes" tenement housing at 3500 Paul Sweet Road. Increased traffic, construction that would limit road access, and the increased competition for parking could significantly delay or block the ability of residents and emergency vehicles to reach Dominican Hospital quickly in times of crisis. Even a few minutes of delay can mean the difference between life and death. Protecting clear and reliable access to medical care should remain a priority for planning decisions in our area.

Paul Sweet Road is a dead end road and the only evacuation route for our community and surrounding homes and businesses. Dominican Oaks has over 200 senior residents, many of whom move slowly or need assistance. During a wildfire or other disaster, safe and timely evacuation is critical. Adding hundreds of cars from this new project, especially while the project is under construction, would create gridlock at the very moment when every second counts. It will also impede any efforts for emergency vehicles to respond to events at either our complex, neighboring homes and businesses. or the project being proposed.

3500 PSR does not conform to Federal FAA Regulations:

At 82 feet in height, this proposed project it is located only 834 feet from the helipad at Dominican Hospital. This greatly exceeds the FAA height limit for buildings near a helipad. To conform to FAA regulations, the maximum height of the 3500 Paul Sweet Road temement project is limited to a maximum height of 33 feet. This allows for a building of only 3 stories.

The county's April 3, 2025 letter to Workbench stated "*It is noted a heliport / EMS landing site is located nearby the project site at Dominican Hospital. It is recommended you confirm the proposed*

Exhibit N

building would conform to any applicable State and Federal regulations governing land use compatibility with the heliport". To date, it appears that Workbench has still not filed a completed FAA Form 7460–1, Notice of Proposed Construction. Please request that Workbench file their proposal for this project with the FAA without further delay.

I understand the need for more housing in Santa Cruz County. Dominican Oaks already contributes to that effort by serving as the only affordable senior housing program in the County. But this particular project is not the right fit for this location. It jeopardizes emergency access, evacuation safety, and the wellbeing of hundreds of vulnerable seniors.

I respectfully urge you to reject this proposal and protect the safety and quality of life for Dominican Oaks residents and the broader community.

Thank you for your time and consideration.

Sincerely,

Virginia W. Lieb
3400 Paul Sweet Road, Unit C-213
Santa Cruz, CA 95065
484-678-8301

Exhibit N

Jonathan DiSalvo

From: judy warner <warnerjudy100@gmail.com>
Sent: Monday, December 15, 2025 12:57 PM
To: Jonathan DiSalvo; Donovan Arteaga; First.district@santacruzca.gov; s.pavonetti@gmail.com; Jessenickell3art@gmail.com; Trina Barton; yeseniajduran@gmail.com; renee@reneesgarden.com; Second District; Justin Cummings; Felipe Hernandez; Fifth District; Sandy Brown
Subject: Proposed Apartments for 3500 Paul Sweet Road, Santa Cruz CA

Follow Up Flag: Follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Santa Cruz County Planning Commission
Santa Cruz County Board of Supervisors

Dear People,

I add my voice to others in opposing the proposed project at 3500 Paul Sweet Road and ask you to vote NO.

During the design process, builders of new construction housing are expected to make reasonable accommodations for the rights of disabled neighbors. The developer has made none for the senior community next door with respect to access to safety during emergencies and to daily life activities. Accessible entrances from Paul Sweet Road and vicinity must always be kept clear and open for evacuations and daily living needs.

Where I am, the Dominican Oaks Senior Community, there are many of us independent-living residents with one or more disabilities that affect eyesight, hearing, breathing, or the ability to make quick decisions and communicate clearly. Many of us have arthritis or issues of the muscular-skeletal system. More

Exhibit N

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Members of the Planning Commission and Board of Supervisors, you share a problem with us--we're all sandwiched between a Housing Element and Builder's Remedy. What started out as the means to a good end has taken us away from local knowledge, wisdom, and the reality check for decision making.

Please vote NO on 3500, and begin working with community and colleagues state-wide at every level of government to end the Builder's Remedy. It's time to take back your power to represent your constituents.

Judy H. Warner
3400 Paul Sweet Road
Santa Cruz, CA 95065

Exhibit N

Jonathan DiSalvo

From: kwthere@gmail.com
Sent: Monday, November 17, 2025 9:00 PM
To: Jonathan DiSalvo
Subject: Proposed development 3500 Paul Sweet Road
Attachments: 3500 PSR FireHazard.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Jonathan DiSalvo
Santa Cruz County Planning Department

I wish to address the potential hazards, of the above development, to the residents of Paul Sweet Road as well as the staff and guests of the Chaminade Resort.

As you are aware, there is a proposal to construct a six story, 105-unit, apartment building at 3500 Paul Sweet Road. In addition, I am sure you are aware of the population that reside up the length of Paul Sweet Road as well as the number of staff and guests that occupy the Chaminade resort. For this population, the only egress, in the event of wildfire, is via Paul Sweet Road to Soquel Drive. 3500 Paul Sweet Road is at the choke-point, should there be an emergency evacuation of the area.

This area of wildland/urban interface, is categorized as “Moderate Severity Zone”, according to the CAL FIRE Fire Hazard Severity Zone Viewer (see attached .pdf). With knowledge of local wildfire history (1985 Lexington Reservoir Fire & 2020 CZU Lightning Complex Fire) as well as the recent wildfires in Southern California, I believe it is imperative that a clear and open evacuation route be available for the residents of Paul Sweet Road as well as for the guests and employees of the Chaminade Resort.

Kent W. Thompson M.D.
3400 Paul Sweet RD, #A315
Santa Cruz, CA 95065
(831) 234-3095
kwthere@gmail.com

Exhibit N

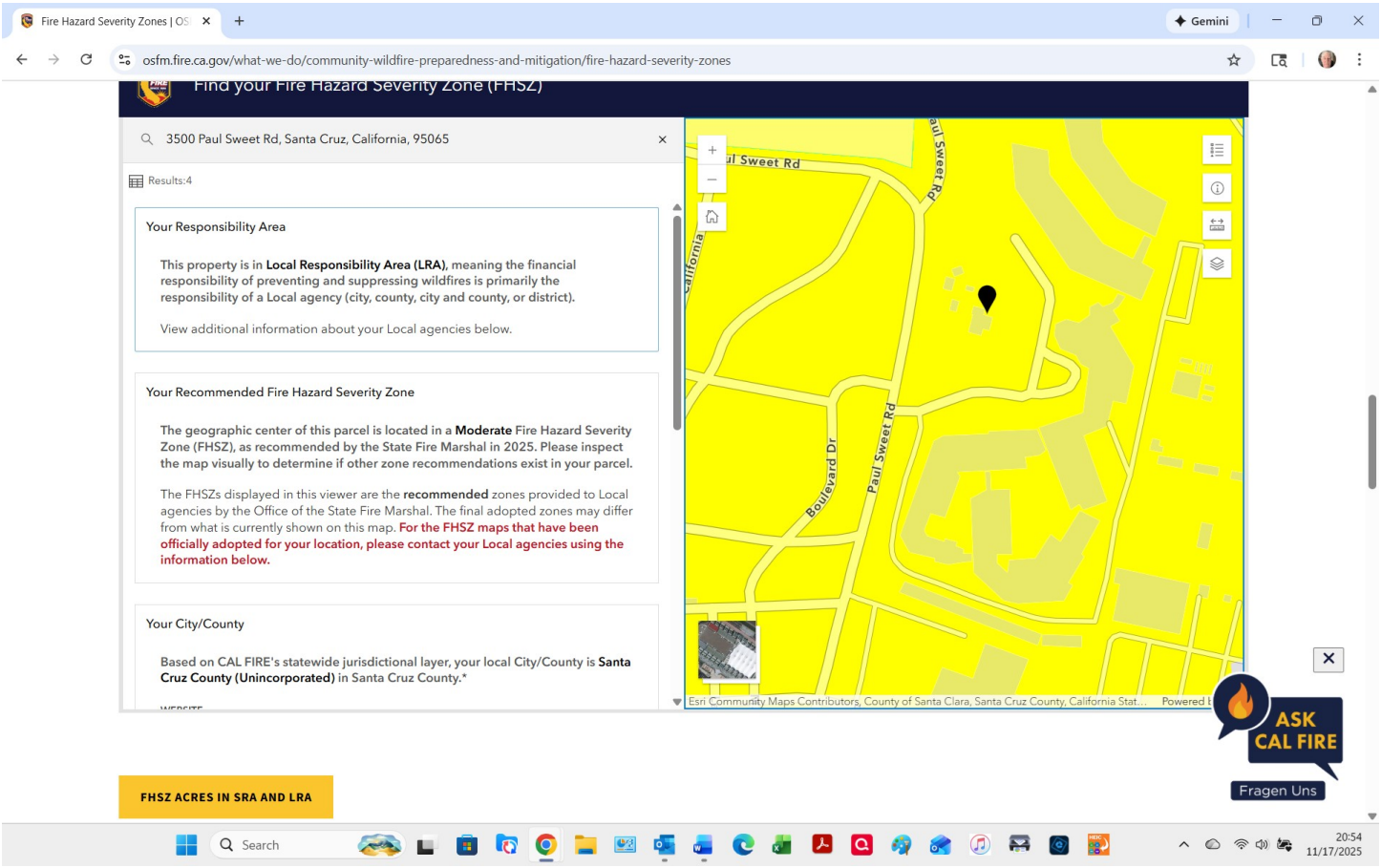
Fire Hazard Severity Zones | OS
Gemini
osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones
Find your Fire Hazard Severity Zone (FHSZ)
3500 Paul Sweet Rd, Santa Cruz, California, 95065
Results:4
Your Responsibility Area
This property is in Local Responsibility Area (LRA), meaning the financial responsibility of preventing and suppressing wildfires is primarily the responsibility of a Local agency (city, county, city and county, or district).
View additional information about your Local agencies below.
Your Recommended Fire Hazard Severity Zone
The geographic center of this parcel is located in a Moderate Fire Hazard Severity Zone (FHSZ), as recommended by the State Fire Marshal in 2025. Please inspect the map visually to determine if other zone recommendations exist in your parcel.
The FHSZs displayed in this viewer are the recommended zones provided to Local agencies by the Office of the State Fire Marshal. The final adopted zones may differ from what is currently shown on this map. For the FHSZ maps that have been officially adopted for your location, please contact your Local agencies using the information below.
Your City/County
Based on CAL FIRE's statewide jurisdictional layer, your local City/County is Santa Cruz County (Unincorporated) in Santa Cruz County.*
Paul Sweet Rd
Boulevard Dr
Esri Community Maps Contributors, County of Santa Clara, Santa Cruz County, California Stat...
ASK CAL FIRE
Fragen Uns
FHSZ ACRES IN SRA AND LRA
Search
20:54
11/17/2025

Exhibit N

Jonathan DiSalvo

From: Jonathan DiSalvo
Sent: Monday, December 1, 2025 11:24 AM
To: 'Tamara Santos'
Subject: RE: Questions regarding Application #241360

Hello Tamara,

The project would construct a sidewalk along the frontage of the project site but would not construct sidewalks extending up Chaminade Lane.

The project does not trigger requirements for intersection improvements.

Thank you,

Jonathan DiSalvo
Senior Planner
Community Development & Infrastructure
Phone: 831-454-3157
701 Ocean Street, Room 400

-----Original Message-----
From: Tamara Santos <tamara4now@gmail.com>
Sent: Monday, December 1, 2025 11:14 AM
To: Jonathan DiSalvo <Jonathan.DiSalvo@santacruzcountyca.gov>
Subject: Questions regarding Application #241360

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Hello Jonathan,

I got your contact as the Project Planner for a proposed development from the posted sign at the site.

I have a couple of questions about this project:

1. Will the development include establishing sidewalks in front of the parcel, and leading up to Chaminade Lane?

2. Do the plans include any improvements to the Soquel Drive/Paul Sweet Road intersection? I'm specifically referring to the narrow lanes and back ups at the stop light, perhaps partially due to the "no right turn on red" rule.

Thank you for your time.

Tamara Santos
Sent from my iPad

Exhibit N

Jonathan DiSalvo

From:	Virginia Lieb <virginia@lieb.com>
Sent:	Friday, December 5, 2025 7:15 AM
To:	Jonathan DiSalvo; Manu Koenig; Jesse Nickell; janerbarr@aol.com; Trina Barton; Sandy Brown; yeseniajduran@gmail.com; kami@davidlyng.com; renee@reneesgarden.com; jagomez173@gmail.com
Cc:	Rachel Howley; Lou McTamaney; Amy Saulnier CA-Santa Cruz; Roy Brewer; john weiser
Subject:	Re: 3500 Paul Sweet Road creates Elder Abuse?
Follow Up Flag:	Follow up
Flag Status:	Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Dear Mr. DiSalvo, other members of the Planning Commission and Supervisor Koenig,

Elder abuse is not just about physical abuse. Builders in California can be liable for elder abuse and neglect if their actions, such as blocking escape routes, endanger seniors. A builder in California can also be charged with reckless endangerment of senior citizens if they willfully or negligently place an elder in a situation where their health or safety is endangered. This can include actions like causing unsafe conditions which the builder knew or should have known because the victims are elder or dependent adults. Examples of such behavior include creating hazardous environments, ignoring known safety risks, or failing to take necessary precautions that could lead to injury or death.

A builder's actions could lead to severe civil liability and criminal charges under elder abuse laws for creating a dangerous situation, especially when building near a senior community. The fact that the victims are vulnerable seniors in a retirement community is a key factor in demonstrating the builder's awareness of the potential harm and the severity of their disregard for that harm.

The addition of hundreds of new residents at “Sweet Homes” with hundreds of their cars will create gridlock on Paul Sweet Road, slowing down emergency responders trying to get critically ill seniors to the energy room in time to safe their lives. In the event of a fire, evacuation will be near impossible because the building will occupy virtually all of the 1/2 acre plot. This leaves no room for fire fighting equipment on the property. Fire equipment will

Exhibit N

be on Paul Sweet Road, blocking traffic or on Dominican Oaks' property, preventing evacuation. A strong earthquake will bring risk of collapse of their six story modular construction building, right onto the vulnerable seniors living at Dominican Oaks.

In addition, If ia builder in CA knowingly allows elderly individuals to suffer unjustifiable mental suffering, remedies are also available under the state's elder abuse laws Residents of Dominican Oaks are terrified of the intrusion of an enormous apartment building into this peaceful community and the many safety risks it imposes on us. A pall of concern rests on us and brings real stress, which can cause real physical deterioration. Workbench's own website implies intrusion onto Dominican Oaks property saying: A system of trails connects the adjacent senior housing facility with the Sweet Homes property allowing neighbors to get to know each other through easy access to shared gathering spaces and amenities. This statement terrifies seniors here, worried that Sweet Homes residents will park in our parking lot, use our dining facilities, meeting rooms and other amenities.

For these reasons and for all the many other health and safety deficiencies with 3500 Paul Sweet Road, please reject approval of this project. Our lives are in your hands.

Sincerely,
Virginia W. Lieb
Resident, Dominican Oaks
484-678-8301

Exhibit N

Jonathan DiSalvo

From:	john weiser <jwweiser@gmail.com>
Sent:	Friday, December 5, 2025 10:18 AM
To:	Virginia Lieb
Cc:	Jonathan DiSalvo; Manu Koenig; Jesse Nickell; janerbarr@aol.com; Trina Barton; Sandy Brown; yeseniajduran@gmail.com; kami@davidlyng.com; renee@reneesgarden.com; jagomez173@gmail.com; Rachel Howley; Lou McTamaney; Amy Saulnier CA-Santa Cruz; Roy Brewer
Subject:	Re: 3500 Paul Sweet Road creates Elder Abuse?
Follow Up Flag:	Follow up
Flag Status:	Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Boy, that's giving them a real whack. I bet they never even heard of elder abuse.

On Fri, Dec 5, 2025 at 7:15 AM Virginia Lieb <virginia@lieb.com> wrote:

> Dear Mr. DiSalvo, other members of the Planning Commission and Supervisor Koenig,
>
> Elder abuse is not just about physical abuse. Builders in California can be liable for elder abuse and neglect if their actions, such as blocking escape routes, endanger seniors. A builder in California can also be charged with reckless endangerment of senior citizens if they willfully or negligently place an elder in a situation where their health or safety is endangered. This can include actions like causing unsafe conditions which the builder knew or should have known because the victims are elder or dependent adults. Examples of such behavior include creating hazardous environments, ignoring known safety risks, or failing to take necessary precautions that could lead to injury or death.

Exhibit N

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For these reasons and for all the many other health and safety deficiencies with 3500 Paul Sweet Road, please reject approval of this project. Our lives are in your hands.

Sincerely,
Virginia W. Lieb
Resident, Dominican Oaks
484-678-8301

Exhibit N

Dear Supervisors,

On Friday, the 20 members of the "Philosophical Exploration Group" at Dominican Oaks met as a "Court of Public Opinion" to vote on whether the '3500 Paul Sweet Road Building Project' is based on sound ethical principles that extend beyond it possibly being legal. The strong consensus was that this project is **not ethical** since it **violates** all nine ethical **principles** that have been developed by civilizations for thousands of years to protect our citizens' physical, mental, and emotional health.

We believe that if you go through a similar process with an open mind and an open heart, you will reach a similar conclusion. We urge you to **VOTE NO** on allowing this project to move forward, since it would cause grievous harm to the health of the surrounding community. The following outline explains our process of inquiry:

Is the "3500 Paul Sweet Road (PSR) Building Project" based on
sound **ETHICAL PRINCIPLES?**

That is the question that our "Philosophical Exploration Group" at Dominican Oaks has been investigating each week for the last month. Here are some of our considerations, shared with others in the hope that it may ignite some discussion by **all** of the stakeholders – – the 200+ residents of Dominican Oaks, the Santa Cruz County research staff who are preparing recommendations for the Planning Commission and the Board of Supervisors, the managers at Workbench who may considering whether to drop or continue this project, and the citizens of Santa Cruz who will all be potentially affected by this decision.

Our approach has been to:

1: Systematically study and understand the ethical PRINCIPLES that have been developed over past centuries, in the Western tradition, the Eastern tradition, and the latest Modern Integral Paradigm.

2. APPLY these principles to the 3500 PSR Project to base our answer to the top question on a more objective set of criteria that go beyond simply our opinions or feelings or conditioned beliefs about what is "ethical".

I. WESTERN Traditional Principles – Immanuel Kant: "The Categorical Imperative." (1780).

Exhibit N

A1: **UNIVERSALIZABILITY:** Before you take a possible action, ask yourself whether you would be willing for EVERYONE to follow that same principle. If the world would be worse off, then the action is not morally permissible.

A2: Case in question: Would you support the universal loosening of practically all zoning laws to allow everyone to build whatever they want, e.g. a 6 story apartment building with 105 units, (six of which are "affordable",) on a 1/2 acre lot, to be placed in front of a 12 acre retirement home with 220 elderly local residents?

B1: **REVERSIBLE:** (Golden Rule) Would you want others to treat you the same way you are treating them? Are you respecting the inherent dignity and intrinsic value of every human being who would be affected by your action?

B2: Case in question: Would the developers be willing to have this action performed in their own front yard, such that it would affect their view from their house, and their quality of life?

C1: **PERSONS** AS AN **END,** or as a Means to an end? Are you treating other persons as a tool to achieve your goals, or considering their well-being as important as your desired result?

C2: Case in question: Is "**more** houses" the only goal, which is being used to justify whatever means it requires, (including the overriding of all local values), or are we guiding our actions by principles that respect every single citizen as a worthy end in themselves?

I I. EASTERN Traditional Principles –The Buddha: (Some 2700 years ago).

A1: Avoid **HARM:** Refrain from harming other living beings.

Exhibit N

A2: Case in question: Would placing a 6 story building on a 1/2 acre lot right in front of a retirement home, cause harm to the residents' mental and emotional health and well-being, possibly creating so much stress that it could even lead to an earlier death in many members of a elderly population?

B1: **APPROPRIATENESS:** We must respond appropriately to all parties who are involved in an action which could drastically change their living circumstances.

B2: Case in question: Will the construction and occupation of a 6 story building, with NO SETBACKS on 1/2 an acre lot, severely disrupt operations and compromise the **health and safety** of a vulnerable elderly resident population who are now living in Dominican Oaks?

C1: **COMPASSION and** LOVING KINDNESS: Open your heart with kindness and **empathy t**oward all living beings.

C2: Case in question: Would proposing a large scale construction project so close to a long-standing senior community show a **lack of compassion, judgment, and long-term vision?**

III. A MODERN 4 Quadrant Integral Model - Ken Wilber: (2000)

A1: **GROWING UP:** Over our lifetime, all human beings have the potential capability to grow and de**velop, t**hereby advancing from a self that is narcissistic and self-centered, to a more ethnocentric viewpoint that cares for the members of a group, up to world-centric that cares for all groups.

A2: Case in question: Would designing apartments with 5% being "affordable" to workers, with 95% out- of-reach to the average worker, demonstrate a level of development that is grown-up, or one that is in drastic need of growing up?

Exhibit N

B1: **WAKING UP:** The possibility exists to wake up, out of a life of separation and pain and suffering, to a more authentic, vital, awakened life. This has been known to be possible for human beings for thousands of years, in most cultures.

B2: Case in point: Would building this structure in this place demonstrate a process of waking up to experience spiritual growth, development, and realization, or a narrow, limited, fragmented stage of consciousness marked by much suffering and anxiety and cravings?

C1: **SHOWING UP:** Every human being has four possible perspectives they can take to reality: **Inner or Outer, Individual or Universal.** Our culture has over-emphasized the outer/individual, at the expense of Wholeness, which requires the combination of all four viewpoints.

C2: Case in point: Is this project seeking primarily benefits for a group of a few individuals who want increase their outer wealth, or have they expanded into considering the effects of this decision on the inner health of the many persons who would be directly affected?

An Artistic Metaphor: Many members in our group have found the beloved book A Christmas Carol by Charles Dickens to be a timely depiction of the inner debate that we are engaged in here. On Christmas Eve, Ebeneezer Scrooge was visited by three ghosts of the Past, Present, and Future, to ask him about which ethical principles he has demonstrated over his lifetime. Did he take everyone into account in the way he related to his Community? Would he want to be treated the same way that he has treated others? Did he consider each person as an end in themselves? Did he harm others by the way he did his business? Was he appropriate to all parties? Did he extend empathy and kindness in all his dealings? Did he grow up and develop beyond early adolescence in his ethical development? Did he wake up to what would be a meaningful life before his death? Did he show up beyond his narrow, shallow self to consider adopting wider, deeper values? Did he finally realize that there was still time to transcend his old self?

Exhibit N

We can all ask ourselves these same questions, and then dialogue with each other, as we all seek to create a world that will work for everyone, and takes into account the needs of **all** our people.

Enjoy this process of self-examination – – learning to look inside as well as outside may be our only chance to live together harmoniously in a world that can continue far into the future.

Gratefully, Robin Sanderson

Exhibit N

4 December 2025

TO: Jonathan DiSalvo
Planning Department
701 Ocean Street, 4th Floor
Santa Cruz, CA 95060
(831) 454-3157
jonathan.disalvo@santacruzcountyca.gov

CC: Bryan Wardlow
Sanitation Engineering division
701 Ocean Street, 4th Floor
Santa Cruz, CA 95060
831-454-2160
bryan.wardlow@santacruzcountyca.gov

Questions and Comments Regarding Sanitation Issues on Application #: 241360; Assessor's Parcel #: 025-013-37 & 102-061-10

REF 1. March 12, 2025 Santa Cruz County Sanitation District Sewer Availability Letter

REF 2. April 3, 2025 County of Santa Cruz Incomplete Application - Additional Information Required Letter

i. Includes March 27, 2025 Sanitation District review

REF 3. May 16, 2025 County of Santa Cruz *Building Resubmittal Response*

i. Includes response to comments received on April 3, 2025

ii. Includes agreement to connect to a manhole at the northeast corner of the property

REF 4. June 13, 2025 County of Santa Cruz Complete Application Submittal

i. Includes Sanitation Review based on May 15, 2025 plans

REF 5. Figure 1 "*Public Sewer Connections, Parcels 025-013-34 & 38"* below

Ref 1 letter states: "*Sewer service is available in County sewer main EB12-EB54 adjacent to this parcel for the subject development".*

We assume that this letter addresses availability of the public sewer if the conditions stated in REF 2-i have been addressed and the requirements in REF4-i have been met. Is this a correct assumption?

REF 3-i states: "*Applicant and Sanitation have inspected the sewer line from the main to the currently existing point of connection in a manhole at the northeast corner of the property. The Applicant's design team and Sanitation agree that the Project can connect to that manhole. The plans have been revised to show this connection".*

Additionally in Comments Response Table - 3rd Submittal of REF 3-i Workbench states: "*Project revised to connect to existing ss line in back corner of project as suggested*".

We assume that the "back corner" refers to the "northeast corner". There is no obvious sewer connection at the northeast corner of the property. Surveys provided by Workbench do not show this connection.

Exhibit N

The only observable sewer connection is in the southeast corner of the property and this connection closely matches publicly maintained EB12 (see Figure 1 below).

If the non-observable northeast corner connection does exist, how does it connect to the public main EB12-EB54?

Why would there be a connection here so far away from the public main?

Also, who suggested that this connection be used? Can you provide documentation that includes the rationale for this suggestion?

It appears from the Comments Response Table that Workbench is using this connection as their formal response to almost all of the issues raised by the sanitation review (REF 2-i).

However, there is no mention of this all of this in REF 4-i. This review indicates Workbench's intent to convert the publicly maintained sewer main (EB12) into a private service lateral and that vacation of EB12 would require an easement from the neighboring property.

How does this correlate with the northeast corner connection discussed in REF 3-i?

If the easement is not granted and Workbench moves their structure off of EB12, what will the county access requirements be, i.e. setback amount?

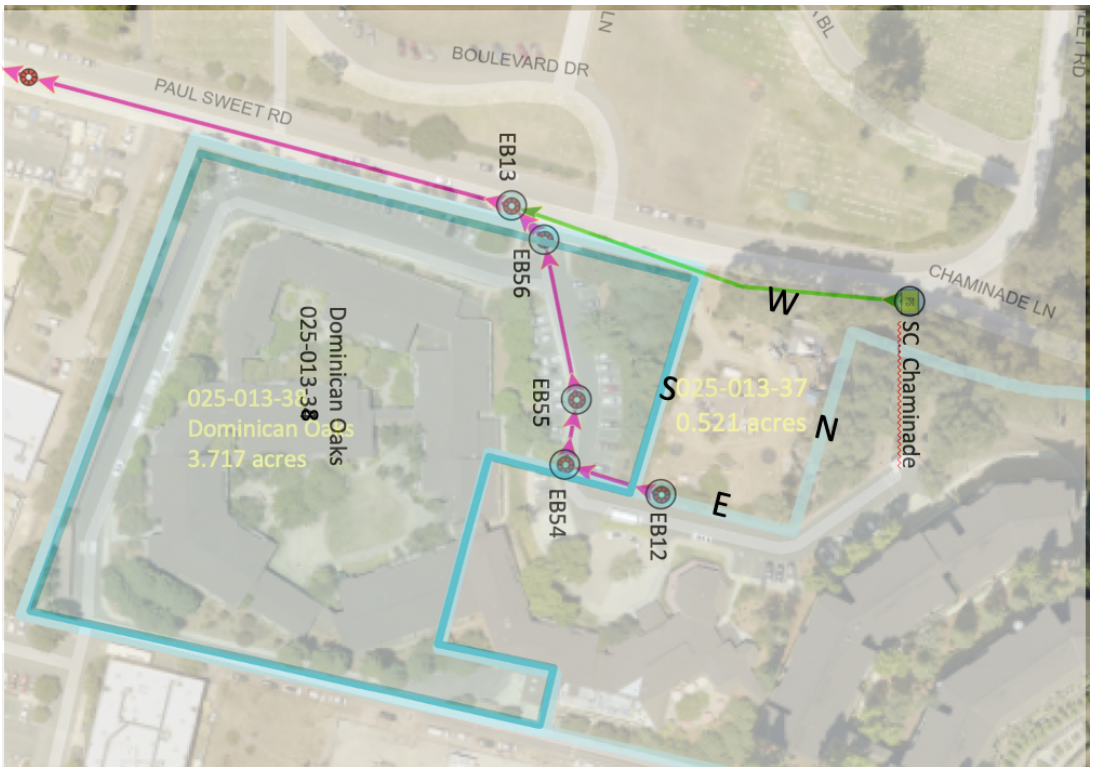

Figure 1 Public Sewer Connections, Parcels 025-013-34 & 38

Thank you for your consideration.
Lou McTamaney, President, Residents Council
Dominican Oaks retirement Community

Exhibit N

Jonathan DiSalvo

From: Aster Peng <asterpeng@gmail.com>
Sent: Tuesday, December 2, 2025 6:03 PM
To: Jonathan DiSalvo
Subject: Strong Opposition to 3500 Paul Sweet Rd Project

Follow Up Flag: Flag for follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Dear Mr. Di Salvo,

My name is **Aster Peng**, and I am writing to express my **strong opposition** to the proposed **105-unit, six-story development at 3500 Paul Sweet Road**. After reviewing the project materials and independent expert analysis, I believe the project poses **unacceptable risks to public safety, emergency access, environmental health, and the wellbeing of vulnerable seniors at Dominican Oaks**.

Below are my most serious concerns:

1. Critical Fire & Emergency Safety Failures

- The building provides **only two sides of fire-apparatus access** — a condition that fire code experts state is **"unlikely to be approved"**.
- Central Fire's Rosenbauer 101' Cobra ladder truck **does not have the necessary clearance** to reach the 6th floor.
- The building places Dominican Oaks **within a collapse zone**, creating a deadly hazard for residents and first responders.
- Independent fire expert **Battalion Chief Bryan Gage** concluded the project provides **"no viable evacuation solution"** for Dominican Oaks, Dominican Hospital, or surrounding neighborhoods.

2. Evacuation Routes Become Compromised

- The proposed project obstructs safe evacuation in an area with **high wildfire danger** and a large population of mobility-limited seniors.
- Emergency vehicles responding to one building would **block access** to the other.
- These evacuation failures create a **life-safety risk** that cannot be mitigated by minor redesign.

3. FAA Compliance Still Not Met

- The developer has **not filed the required FAA Form 7460-1**, despite the building's proximity to the Dominican Hospital heliport.
- FAA review may mandate **height reduction** or aviation warning lights — clear signs that the current massing is inappropriate and noncompliant.

Exhibit N

4. Dominican Oaks is a Sensitive Receptor

- Dominican Oaks houses a vulnerable senior population, many with mobility limitations and medical needs.
- As a **state-recognized sensitive receptor**, the facility requires enhanced protection from:
    - evacuation and fire-safety risks
    - construction dust, noise, and vibration
    - air quality impacts
- Placing a 6-story tower feet from their front yard violates the intent of this designation.

5. Incompatible Massing and Overdevelopment of a 1/2-Acre Lot

- A massive **6-story, 105-unit tower on a 1/2-acre parcel** is fundamentally incompatible with the scale of adjacent buildings.
- Model images show the building visually dominates and overwhelms the neighborhood.
- The project appears to rely on extreme over-densification to make the site profitable rather than safe.

6. Insufficient Parking Will Burden Hospital and Senior Facilities

- The project provides ***only 74 parking spaces for 105 units***.
- Overflow will inevitably spill into Dominican Oaks and Dominican Hospital — both of which require clear access for emergency transport.

7. CEQA Exemption Would Be Inappropriate

Given the documented issues involving evacuation, fire-access limitations, heliport impacts, sensitive receptor proximity, and traffic/safety concerns, this project **cannot qualify for a CEQA exemption** and must undergo full environmental review.

My Request:

For the safety of residents, first responders, and the broader community, I respectfully urge the County to:

- Deny the project as proposed, or

- Require a full redesign and full CEQA review, including independent fire-safety and evacuation studies.

Thank you for your time and consideration. Public safety and the protection of vulnerable seniors must come first.

Sincerely,
Aster Peng
Resident off Paul Sweet Road

Exhibit N

Jonathan DiSalvo

From: Aster Peng <asterpeng@gmail.com>
Sent: Tuesday, December 2, 2025 6:03 PM
To: Jonathan DiSalvo
Subject: Strong Opposition to 3500 Paul Sweet Rd Project

Follow Up Flag: Flag for follow up
Flag Status: Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Dear Mr. Di Salvo,

My name is **Aster Peng**, and I am writing to express my **strong opposition** to the proposed **105-unit, six-story development at 3500 Paul Sweet Road**. After reviewing the project materials and independent expert analysis, I believe the project poses **unacceptable risks to public safety, emergency access, environmental health, and the wellbeing of vulnerable seniors at Dominican Oaks**.

Below are my most serious concerns:

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- Deny the project as proposed, or

- Require a full redesign and full CEQA review, including independent fire-safety and evacuation studies.

Thank you for your time and consideration. Public safety and the protection of vulnerable seniors must come first.

Sincerely,
Aster Peng
Resident off Paul Sweet Road

Exhibit N

Jonathan DiSalvo

From: Andrew Pomerantz <ajpomerantz@gmail.com>
Sent: Tuesday, December 23, 2025 2:49 PM
To: Jonathan DiSalvo
Subject: Support for 3500 Paul Sweet Road Project

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Hi Jonathan,

I'm writing to express my support for the proposed housing project at 3500 Paul Sweet Road. The local community is in desperate need of housing, and I appreciate the thorough work the County has undertaken in reviewing this application. The project has undergone extensive vetting over several years, and meets all housing compliance requirements.

I strongly support moving it forward through approval so it can deliver much-needed homes for Santa Cruz's renters. Thank you for your time and for your continued service to the County and the broader community.

Best,
Andrew

Exhibit N

Jonathan DiSalvo

From: Omri Even-Tov <omri.eventov@gmail.com>
Sent: Monday, December 29, 2025 9:39 PM
To: Jonathan DiSalvo
Subject: Supporting Workbench's Housing Efforts in Santa Cruz County

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Hi Jonathan,

My family and I spend a lot of time in Santa Cruz, and I've long considered relocating there. The biggest hurdle has been the limited housing supply, which makes it hard for many families to find a viable path into the community.

I'm very supportive of Workbench's efforts to expand housing in Santa Cruz County, and I hope those efforts make it possible for me, and eventually my children, to call such a special place home.

Best,
Omri

Omri Even-Tov
Associate Professor
Faculty Director of the Center for Social Sector Leadership
Haas School of Business
University of California, Berkeley
(310)-430-2236 (Mobile)
Follow CSSL on LinkedIn

Exhibit N

Jonathan DiSalvo

From:	Rachel Howley CA-Santa Cruz <rachel.howley@commonspirit.org>
Sent:	Monday, January 5, 2026 2:33 PM
To:	Jonathan DiSalvo; Natalie Kirkish
Cc:	Roy Brewer; Amy Saulnier CA-Santa Cruz
Subject:	CONCERN REGARDING: Application #: 241360; Assessor's Parcel #: 025-013-37 & 102-061-10 Fire Review / Central Fire District
Follow Up Flag:	Follow up
Flag Status:	Flagged

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Dear Mr. DiSalvo and Mrs. Kirkish,

This email is to formally inquire about the Santa Cruz County Planning Department's determination of completeness for the Workbench application, specifically regarding the discrepancies in the timeline of review, the unresolved concerns that remain, and the inconsistencies within the submitted documentation.

We understand that the Planning Department deemed the Workbench application complete on June 13th. However, we are puzzled by this conclusion, given that the Fire Department's review was not finalized until December 22nd. We request clarification on how an application can be considered complete when a critical component of the review, particularly one pertaining to public safety, was still outstanding several months after the completeness determination. This timeline raises significant questions about the robustness of the initial completeness assessment process.

Furthermore, we wish to reiterate that several aspects of the application remain unclear and, in our view, have not received true and thorough attention. These concerns include, but are not limited to:

- **Collapse Zone:** What specific mitigation measures or assessments have been incorporated regarding potential collapse zones and their impact on adjacent properties or public areas?
- **Evacuation Routes:** How have the proposed evacuation routes been comprehensively evaluated for their efficacy, especially in emergency scenarios, and what contingencies are in place for unforeseen circumstances?
- **Applicant's Intended Use of Dominican Oaks Private Property for Fire Access:** We are particularly concerned about the proposed reliance on Dominican Oaks private property for fire access. What formal agreements, easements, or legal assurances are in place to guarantee uninterrupted and perpetual access for emergency services, and how does the County ensure that this private ownership will not impede critical response times?
- **Applicant's Intended Use of Private Property Fire Hydrant Fed by Private Property Fire Pump:** Similarly, the proposal to utilize a fire hydrant fed by a private property fire pump raises questions about maintenance, reliability, water pressure consistency, and accessibility for public fire services. What guarantees are in place to ensure this private infrastructure meets public safety standards and is adequately maintained and accessible at all times?

Exhibit N

Moreover, we have noted a direct contradiction within the submitted materials. We received a response from Erin Collins stating that "engines will not park in a way that prevents emergency evacuations." However, this assertion is explicitly contradicted by the applicants' own submitted fire response plan, which demonstrably shows fire apparatus parking in locations that would obstruct or significantly impede emergency evacuation routes. This fundamental inconsistency undermines the credibility of the safety planning presented and requires immediate clarification and resolution.

We believe that these are fundamental issues directly impacting public safety and the community. We request an explanation of how the County arrived at its completeness determination on June 13th, given the late fire department review, and how these specific concerns, particularly the contradiction regarding emergency vehicle parking and evacuation routes, are being addressed within the context of the completeness finding and subsequent review process.

We look forward to your response and an explanation of these matters. We are eager to understand how the County plans to thoroughly address these outstanding issues before the intended planning commission hearing on January 14th.

Sincerely,

--

Rachel Howley

VP, Ancillary Services

Dignity Health
Dominican Hospital
1555 Soquel Drive

Santa Cruz, CA 95065
831.462.7336 (O) 561-721-5769 (C)

Rachel.Howley@commonspirit.org

Caution: This email is both proprietary and confidential, and not intended for transmission to or receipt by any unauthorized persons. If you believe that it has been received by you in error, do not read any attachments. Instead, kindly reply to the sender stating that you have received the message in error. Then destroy it and any attachments. Thank you.

Caution: This email is both proprietary and confidential, and not intended for transmission to (or receipt by) any unauthorized person(s). If you believe that you have received this email in error, do not read any attachments. Instead, kindly reply to the sender stating that you have received the message in error. Then destroy it and any attachments. Thank you.

Exhibit N

Jonathan DiSalvo

From: Roy Brewer <rbrewer@brewerlofgren.com>
Sent: Tuesday, January 6, 2026 9:54 AM
To: Jane Barr (alternate); Jenni Gomez (alternate); Jesse Nickell; Kami Bachir (alternate); Luke Rizzutto, Jr. (alternate); Renee Sheperd; Sandy Brown; Shane Pavonetti; Trina Barton; Yesenia Jimenez (vice chair)
Cc: Jonathan DiSalvo; Natalie Kirkish
Subject: 3500 Paul Sweet Road - Fire Safety Supplemental
Attachments: Collapse Zones.pdf; Collapse Zone Proximity Exhibit.pdf

Follow Up Flag: Follow up
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Good morning,

As a follow-up to my first fire safety email of December 16th, I offer additional information related to collapse zones of structures based on federal guidance from the U.S. Department of Health and Human Services, National Institute for Occupational Safety and Health. (see the article attached above) Firefighter safety and the health and safety of the elderly and mobility challenged residents of Dominican Oaks requires careful attention to the risks presented by a residential tower of the scale proposed that has no appreciable setback from the adjacent property. The collapse zone of the tower as proposed is approximately 99 feet. A collapsing tower would likely destroy the meal service area in the rotunda, a distance of only 50 feet, and would also block the driveway, denying first responders an evacuation path for those living at Dominican Oaks. (see the Collapse Zone Proximity Exhibit, attached)

Combining the distance from the property line of the applicant's property to the westernmost curb of the Dominican Oaks driveway/fire access road (approximately 10.5 feet) with the definition of a collapse zone per the Department of Health and Human Services guidance cited above (1.5 times the height of the structure), results in setbacks as presented below, with all measurements rounded to the nearest whole number:

1. 66-foot height (Sheet AP3.01 of the Applicant's submittal) = 99-foot collapse zone, requiring an 88-foot setback from the property line.
2. A 20% reduction in height = building height of 53 feet = 79-foot collapse zone, requiring a 69-foot setback from the property line.
3. A 40% reduction in height = building height of 40 feet = 60-foot collapse zone, requiring a 49-foot setback form the property line.
4. A 50% reduction in height = building height of 33 feet = 50-foot collapse zone, requiring a 39-foot setback from the property line.
5. A 60% reduction in height = building height of 26 feet = 40-foot collapse zone, requiring a 29-foot setback from the property line.

Exhibit N

To accommodate a zero (0) foot setback as the applicant proposes and an 11-foot (rounded) collapse zone, the building height would be limited to slightly more than seven (7) feet.

Thank you for your consideration of this supplemental information. On the basis of public health and public safety reasons presented here and in previous correspondence, we ask that you deny the project.

Roy E. Brewer
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Exhibit N

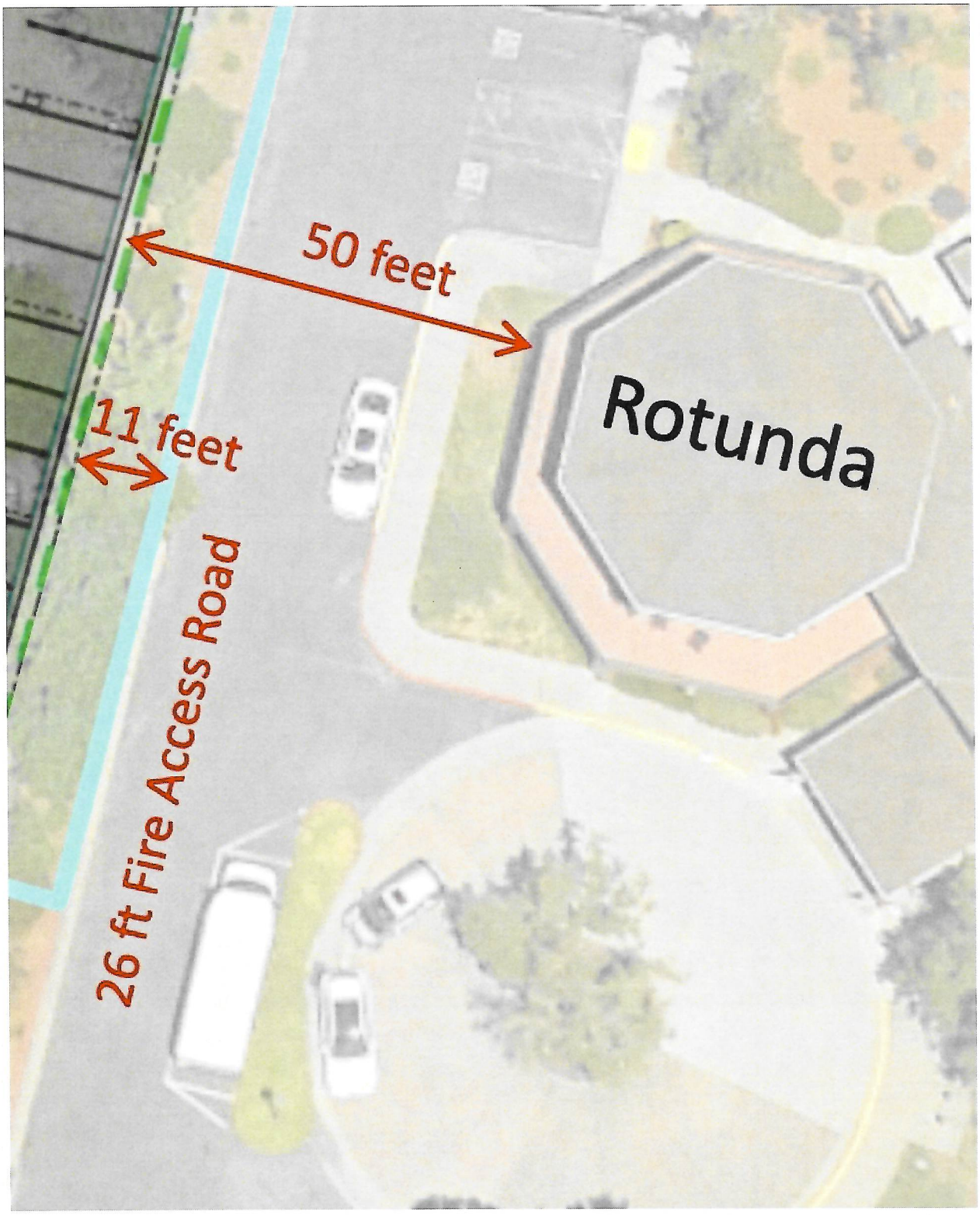

Exhibit N

WORKPLACE SOLUTIONS

From the National Institute for Occupational Safety and Health

Preventing Deaths and Injuries to Fire Fighters by Establishing Collapse Zones at Structure Fires

Summary

Fire fighters are at significant risk for injury or death due to structural collapse during fire-fighting operations. Structural collapse often occurs without warning. The National Institute for Occupational Safety and Health (NIOSH) recommends that the Incident Commander establish defensive operations and collapse zones when there is potential for a structural collapse during fire-fighting operations.

Description of Exposure

The United States Fire Administration reported that 1,230 fire fighters died between 2000 and 2012. Structural collapse caused 142 of these fire fighter deaths (11.5%). Structural collapse often results in multiple fire fighter injuries and fatalities. The number of fatalities includes fire fighters killed by collapse inside and outside a structure.

Although structural collapse is a significant cause of injury and death to fire fighters, the potential for a structural collapse is one of the most difficult situations to predict. A collapse zone is defined as the area around the perimeter of a structure that could contain debris if the building collapsed. This area is often defined by establishing a perimeter at a distance from the building that is equal to 1½ times the height of the structure.

When established, a collapse zone should be identified by a fireground transmission, colored tape, signage cones, flashing beacons, fences, or other appropriate means. A "No Entry" policy should be enforced by the Incident Commander, Incident Safety Officer, Division/Group Supervisors, and company officers. When it is not possible or practical to visually mark a collapse zone, the Incident Commander should verbally identify the collapse zone area to all fireground personnel via radio or other communication methods. During structure fires, the Incident Commander should initially evaluate and continually reevaluate risk factors, including the potential for structural collapse based on direct observations, reports, and pre-incident plan information.

An exclusion zone should be established during large or extended fire-fighting operations. An exclusion zone is defined as a zone established by the Incident Commander to prohibit specific activities in a specific geographic area. If the fire is not contained and an exterior (defensive) attack becomes necessary, the exclusion zone is moved far enough away from the structure to place the fire fighters outside of the collapse zone. In large or extended fire-fighting operations, these zones must be continually adjusted as necessary, and all personnel at the scene must be made aware of the exclusion zone or collapse zone locations.

Determining when to establish a collapse zone starts with a community risk assessment program. Community risk assessments satisfy many fire department objectives, but one of the most important aspects is to evaluate the fire risk associated with occupancy and construction classifications. A

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Centers for Disease Control and Prevention
National Institute for Occupational Safety and Health

Exhibit N

community risk assessment program, coupled with a pre-incident planning initiative that evaluates building construction, structural integrity, fire load, and fire protection systems is a vital tool for safely fighting fires. Fire departments should ensure all members are trained in the organization's rules of engagement, risk assessment, and situational awareness procedures.

Understanding the influence that building design, construction, and conditions have on structural collapse potential has a direct correlation to safe fireground operations and fire fighter survivability. A collapse zone should be established whenever the risk of structural collapse is identified as a potential occurrence.

Fire departments should not rely solely on the amount of time a fire has been burning as a collapse predictor. External loads, such as a parapet wall, steeple, overhanging porch roof, awning, sign, or large electrical service connections may also cause structural collapse. Other factors to consider include:

- Construction type
- Age and condition of the building
- Pre-existing structural damage/deterioration
- Structural weakness caused by explosion or impact
- Presence of free-standing parapets
- Presence of wall anchor plates or stars
- Engineered load systems/lightweight construction
- Types of doors and windows
- Roof design and covering including HVAC units on fast food occupancy roofs
- Renovation/modifications to structure
- Height of the building
- Fire duration, size and location
- Fuel loads
- Fire behavior
- Fire protection features such as sprinkler systems and fire walls
- Weight of fire fighters and water used for extinguishment

Free standing parapets are often identified as a special risk factor in ordinary (brick) construction buildings (See Diagram 1 and Photo 1). In many cases, roof collapse causes a parapet to become unstable or collapse without warning.

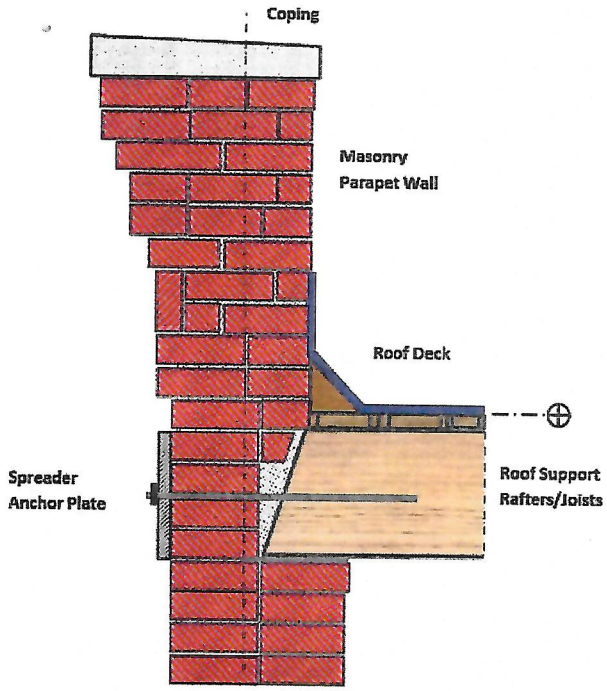

Diagram 1. An example of a parapet wall.

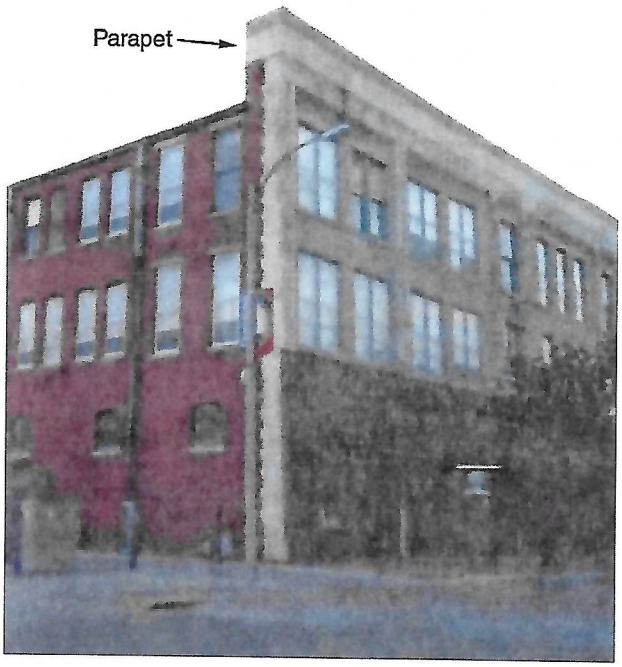

Photo 1. Building with parapet wall (Courtesy of Buildingsonfire.com)

Exhibit N